

# **EXHIBIT 11**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

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AUBRY MCMAHON,

Plaintiff, Case No.: 2:21-cv-00920

-against-

WORLD VISION, INC.,

Defendant.

-----x

VIDEO CONFERENCE  
DEPOSITION

March 2, 2023  
1:00 p.m.

EXAMINATION BEFORE TRIAL of

CATHERINE MIOLLA, a nonparty witness on behalf  
of the Defendant herein, taken by the attorney(s)  
for the Plaintiff, pursuant to Notice, held at  
the above-mentioned time and place, before  
THERESA RATIGAN, a shorthand reporter and Notary  
Public within and for the State of New York.

March 02, 2023

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 2  A P P E A R A N C E S :  NISAR LAW GROUP, PC Attorneys for Plaintiff 60 East 42nd Street, Suite 4600 New York, New York 10165  BY: CASEY WOLNOWSKI, ESQ. cwlnowski@nisarlaw.com  GAMMON & GRANGE, PC Attorneys for Defendant 1945 Old Gallows Road Tysons, Virginia 22182  BY: SCOTT J. WARD, ESQ. sjw@gg-law.com J. MATTHEW SZYMANSKI, ESQ. jms@gg-law.com  A L S O P R E S E N T : STEVE McFARLAND, Chief Legal Officer for World Vision Incorporated	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
	Page 4  C. Miolla (Time noted: 1:03 p.m.)  THE REPORTER: Good afternoon. My name is Theresa Ratigan. I'm with U.S. Legal Support, and I am the court reporter this afternoon.  The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting this deposition remotely.  They further acknowledge that, in lieu of an oath administered in person, I will administer the oath remotely under penalty of perjury.  The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting.  Please indicate your agreement by stating your name and your agreement on the record; counsels only, please.  MR. WOLNOWSKI: Casey Wolnowski; I agree. MR. WARD: Scott Ward; I agree. MR. SZYMANSKI: Matthew Szymanski; I agree.	Page 3  S T I P U L A T I O N S IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, through their respective counsel, that the certification, sealing, and filing of the within examination will be, and the same are hereby waived;  IT IS FURTHER STIPULATED AND AGREED that all objections, except as to the form of the question, will be reserved to the time of the trial;  IT IS FURTHER STIPULATED AND AGREED that the within examination may be signed before any Notary Public with the same force and effect as if signed and sworn to before this Court.  C. Miolla (Identification of witness verified) C A T H E R I N E M I O L L A, a nonparty witness herein, after having first been duly sworn by a Notary Public of the State of New York, upon being examined, testified as follows: BY THE REPORTER: Q Please state your name for the record. A Catherine Miolla. Q And your address for the record, please? A 4123 East Carla Vista Drive, and that's in Gilbert, Arizona 85295. EXAMINATION BY MR. WOLNOWSKI: Q Good afternoon, Ms. Miolla. Let me go over some of the general ground rules. My name is Casey Wolnowski. I represent the plaintiff, Aubry McMahon, with respect to her lawsuit against World Vision Incorporated. You are not personally a defendant in this lawsuit; do you understand? A Yes. Q I'm going to ask you a series of questions concerning the circumstances surrounding Ms. McMahon seeking employment with World Vision. My goal today is not to confuse you.

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1	C. Miolla	1	C. Miolla
2	If you do not understand a question that	2	Given that we are conducting this
3	I ask you, please tell me that you don't understand	3	deposition via video, there are few questions I would
4	or ask me to rephrase the question, and I will do my	4	like to ask.
5	best to do that. In other words, unless you tell me,	5	Is there anyone else in the room where
6	I'll assume that by you answering the question, you	6	you're currently sitting?
7	had no problem understanding the question; is that	7	A No.
8	okay?	8	Q If anyone enters the room where you are
9	A Yes.	9	sitting during the deposition, I kindly ask that you
10	Q If you want to take a break, we can do	10	please identify that person for me.
11	that; however, all that I ask is that if there is a	11	Do you have any documents in front of you
12	pending question, please answer it before we take a	12	or anything viewable on your computer screen aside
13	break.	13	from this video platform?
14	Do you understand?	14	A No.
15	A Yes.	15	Q If at any point that changes, please
16	Q Please verbalize your answers. Shaking	16	inform me of what documents you have in front of you
17	of the head or answers such as "uh-huh" may not	17	or what is on your screen.
18	necessarily be clear for the court reporter who is	18	I also kindly ask you not to communicate
19	typing down your answers today.	19	with your attorney or any other individual when
20	Also, please wait until I finish my	20	testifying on the record; this includes communication
21	question before you answer. Not only will that make	21	via text, e-mail, instant messaging, GChat, WhatsApp,
22	for the creation of a cleaner record, it will also	22	or any other electronic chat function.
23	make the court reporter's life easier today.	23	You were previously sworn in by the court
24	Do you understand?	24	reporter.
25	A Yes.	25	Thus, are you aware that you are under
Page 8		Page 9	
1	C. Miolla	1	C. Miolla
2	oath?	2	A No.
3	A Yes.	3	Q Did you review any documents in
4	Q Do you understand that the oath you just	4	preparation for today's deposition?
5	took is the same oath you would take if this were a	5	A No.
6	trial before a judge?	6	Q Did you listen to any audio recordings in
7	A Yes.	7	preparation for today's deposition?
8	Q Do you understand that the oath you just	8	A No.
9	took mandates that you tell the truth, the whole	9	Q Did you speak with anyone aside from your
10	truth, and nothing but the truth?	10	attorney in preparation for today's deposition?
11	A Yes.	11	A No.
12	Q The questions I'm about to ask you are	12	Q I may use the acronym LGBTQ at points
13	routine that I ask every person before I depose them.	13	throughout this deposition. I will advise that for
14	Are you under the influence of drugs or	14	the purposes of this deposition, LGBTQ stands for
15	alcohol today?	15	lesbian, gay, bisexual, transgender, queer or
16	A No.	16	questioning.
17	Q Are you under the influence of any	17	Do you understand?
18	medication which may impair your ability to	18	A Yes.
19	understand my questions or to tell the truth?	19	MR. WARD: I'm just going to register for
20	A No.	20	the record an objection to the definition as
21	Q Can you think of any reason why you	21	one that has ambiguity within it. That's
22	cannot provide truthful testimony here today?	22	sufficient.
23	A No.	23	Thank you.
24	Q Has anybody told you not to give truthful	24	Q Ms. Miolla, have you ever been deposed
25	testimony here today?	25	before?

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1		C. Miolla	C. Miolla		
2	A	No.	Q	And for how long did that role last?	
3	Q	For whom are you currently employed?	A	About one year.	
4	A	World Vision.	Q	What was the next job you held after that	
5	Q	Ms. Miolla, do you have a bachelor's	with World Vision?		
6		degree?	A	After that, I was on our team that worked	
7	A	Yes.	on the human resources help desk.		
8	Q	From where?	Q	For how long did you have that job?	
9	A	Pacific Lutheran University.	A	I think about a year as well.	
10	Q	When did you receive it?	Q	What job did you have after the job with	
11	A	I received it in 2015.	respect to being on the team that worked on the HR		
12	Q	Is that the year you graduated from	help desk?		
13		college?	A	After that, I was on our benefits team.	
14	A	Yes.	Q	And how long did you hold that position?	
15	Q	Do you have any advanced degrees beyond a	A	I think about two years.	
16		bachelor's degree?	Q	What was the next job you held with World	
17	A	No.	Vision after that?		
18	Q	When did you first start working for	A	My next job was on our recruiting team.	
19	World Vision?	Q	And approximately how long did you have		
20	A	I start interning with World Vision in	the job on the recruiting team?		
21	April of 2015.	Q	A	I've been on our recruiting team, I	
22	What was the next position you had with	think, for about four years.			
23	World Vision after intern?	Q	What positions or position did you hold		
24	A	My next position was a limited-term role	with World Vision in January of 2021?		
25	within the same team in HR.	A	I think it was just a recruiter on our		
		Page 12	Page 13		
1		C. Miolla	C. Miolla		
2		recruiting team or talent acquisitions specialist.	Q	If you could, please walk me through a	
3	Q	Do you recall if you held the position of	4	typical week of work for you as a talent acquisition	
4		talent acquisition partner of human resources?	5	partner, human resources for World Vision	
5	A	That sounds right.	6	Incorporated around January of 2021.	
6	Q	Do you recall whether or not that was	7	A	A typical week would include time
7		your title as it appeared in signature blocks on	8	reviewing candidate applications, reaching out to	
8	e-mails?	9	9	candidates, conducting phone interviews, and talking	
9	A	I believe that's correct.	10	10	with our hiring managers and scheduling interviews
10	Q	If you could, Ms. Miolla, please explain	11	11	for them, as well as administrative tasks.
11		to me what were the primary duties and	12	Q	Approximately how many hours a week did
12	responsibilities of a person holding the title of	13	13	you work in January of 2021?	
13	talent acquisition partner, human resources in	14	A	Around 40.	
14	January of 2021.	15	Q	Did your job title change at all at any	
15	A	Those responsibilities would be reviewing	16	16	point after January of 2021?
16	candidate applications, conducting interviews, and	17	A	At one point I churned (sic) -- changed	
17	working with our hiring managers.	18		to a senior talent acquisition specialist.	
18	Q	What you just described, were these the	19	Q	Do you recall around when that occurred?
19	duties and responsibilities that you personally	20	A	I believe it was around March of last	
20	maintained while working for World Vision	21	21	year; so March 2022.	
21	Incorporated in January of 2021?	22	Q	Is that the position that you currently	
22	A	Yes.	23	hold?	
23	Q	From your knowledge, experience, and	24	A	Yes.
24	observations, have those duties and responsibilities	25	Q	In January of 2021, where was the office	
25	changed at all between January of 2021 and today?				

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1		C. Miolla	
2		physically located from which you primarily worked?	1 Q Most people didn't.
3	A	Seattle, Washington -- or Federal Way, Washington.	2 Ms. Miolla, I'd like to shift gears
4			3 somewhat, and I'd like to ask you some questions
5	Q	In January of 2021, from your	4 about a person named Aubry McMahon, who also
6		recollection, how frequently did you go into the	5 occasionally goes by the name of Aubry Atwood.
7		office to work itself?	6
8	A	At that point, almost never.	7 Going forward, if I refer to Aubry
9	Q	Do you work out of an office as of today,	8 McMahon, I'm also referring to Aubry Atwood; do you
10		March 2nd, 2023?	9 understand?
11	A	No.	10 A Yes.
12	Q	And from where do you physically work as	11 Q They are indeed the same person; do you
13		of today, March 2nd, 2023?	12 understand that?
14	A	I work from home in Gilbert, Arizona.	13 A Yes.
15	Q	Approximately how many days a year do you	14 Q At some point, did you come to learn that
16		actually work in any office or anywhere outside of	15 a person named Aubry McMahon or Aubry Atwood had
17		Arizona?	16 applied for employment with World Vision
18	A	As of now?	17 Incorporated?
19	Q	Correct.	18 A Yes.
20	A	Less than five days a year.	19 Q Do you know how she applied for work; was
21	Q	In the month of January of 2021, that's	20 it through Indeed, was it directly through a World
22		the -- the entire month, how frequently did you work	21 Vision Web site, was it through a recruiter,
23		physically in a World Vision office as opposed to	22 something else?
24		working remotely?	23 A I don't remember the source.
25	A	I didn't go into the office at that time.	24 Q Okay. How did you first learn about
			25 Aubry McMahon applying for employment with World
		Page 16	Page 17
1		C. Miolla	C. Miolla
2		Vision Incorporated?	1 it related to Aubry McMahon's application?
3	A	I first saw her application in our	2
4		applicant tracking system.	3 A My role -- role was to review the
5	Q	Ms. Miolla, as for this applicant	4 application, and then move for- -- forward to other
6		tracking system, if you can recall in January of	5 steps like the online assessment, phone screen, and
7		2021, was this something that you checked daily,	6 video interview with the hiring managers.
8		weekly, hourly, something else?	7 Q Now, you had mentioned that you were the
9	A	Probably daily.	8 assigned recruiter to the position for which Aubry
10	Q	What was your role specifically with	9 McMahon had applied.
11		respect to Aubry McMahon and the application process	10 If you can recall, what position was
12		for potential employment with World Vision	11 that?
13		Incorporated?	12 A It was the donor/customer service
14	A	Can you ask that again?	13 representative trainee position.
15	Q	Sure.	14 Q And from your recollection, were you the
16		What was your role specifically with	15 assigned recruiter for all people who applied to
17		respect to Aubry McMahon and the application process	16 World Vision Incorporated for that position?
18		for potential employment with World Vision	17 A At that time, yes.
19		Incorporated?	18 Q Was there anybody else who was assigned
20	A	I was the assigned recruiter to the role	19 to be the recruiter for that particular position with
21		that she had applied for.	20 World Vision Incorporated, from your recollection?
22	Q	And if you can explain to me, what does	21 A Not at that time.
23		an assigned recruiter -- question withdrawn.	22 Q Has that changed since January of 2021?
24		If you can explain to me, in January of	23 A Sometimes now when we hire, there's
25		2021, what was your job as an assigned recruiter as	24 couple of us that work on it together.
			25 Q So if I'm understanding, what you're

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1	C. Miolla	1	C. Miolla
2	explaining is that back in January 2021, you were the	2	as well as any phone call, video conference, or any
3	sole person; however, since then, at some point,	3	time you would have met in person.
4	there have been more than just one person who is the	4	A Okay. I still don't know the exact
5	assigned recruiter for the customer service trainee	5	amount.
6	position?	6	Q Would you say it was between six and ten?
7	A Sometimes, yes.	7	A Probably more.
8	Q Ms. Miolla, from 2020 going into 2021,	8	Q Would you say it was between 11 and 15?
9	how many interactions did you have with Aubry McMahon	9	A That sounds roughly correct. I don't
10	whether it be via in person, telephone, e-mail, video	10	remember the exact number of e-mails.
11	conference, or any other form of communication?	11	Q Would you say it was between 16 and 20?
12	A I don't remember the exact number.	12	A Probably somewhere between ten and 20.
13	Q Would you say it was fewer than five?	13	Q Of those ten to 20 interactions you had,
14	A No.	14	how many would you state were e-mails?
15	Q Would you say it fewer -- excuse me,	15	A I think we -- I think there were only
16	would you say it was between six and ten?	16	three times when it wasn't an e-mail.
17	A Can you ask the question again?	17	Q Okay. So the non-e-mails, you would say
18	Q Sure.	18	those were approximately three communications?
19	From 2020 going into 2021, how many	19	A From what I can remember.
20	interactions did you have with Aubry McMahon whether	20	Q If you could, please explain to me the
21	it be via in person, telephone, e-mail, video	21	three communications which were non-e-mail related.
22	conference, or any other form of communication?	22	This is again, time period is from 2020 going into
23	A And would each e-mail count as its own	23	2012.
24	interaction?	24	A Well, the first time I talked to her on
25	Q Yes. Let's count that as an interaction,	25	the phone was when she did her initial phone
Page 20		Page 21	
1	C. Miolla	1	C. Miolla
2	interview. I was a part of her second interview at	2	Q Approximately how long did the phone call
3	the time, which was a video interview. And then	3	last?
4	after that, I think we talked on the phone maybe one	4	A I don't remember exactly. Maybe around
5	or two more times.	5	30 minutes.
6	Q When you mention that you spoke on the	6	Q Do you recall when that phone call took
7	telephone one or two more times, was one of these a	7	place?
8	phone screening, or was that described as one of the	8	A I don't remember the date, but I think it
9	first phone calls that you made with her?	9	was December of 2020.
10	A The first time we talked on the phone was	10	Q If you could, please explain to me
11	her phone screen interview.	11	everything you can remember about the second
12	Q Okay. And when you mention that you	12	communication you had with her, which was non-e-mail,
13	spoke to her one or two more times, are you including	13	which I believe you described as a video interview.
14	in that the January 8th phone call where Melanie	14	A Yes. The video interview was with
15	Freiberg was also a participant on that call?	15	myself, and Anthony Williams was our representative
16	A Yes.	16	from the call center for that interview, he's our --
17	Q Okay. If you could, Ms. Miolla, please	17	the senior director of the call center, and the two
18	explain to me everything you can remember about that	18	of us asked her interview questions about her job
19	first phone call, which was the initial phone	19	experience and skills.
20	interview with Ms. McMahon.	20	Q Approximately how long did that video
21	A I remember going through the three sets	21	call last, from your recollection?
22	of standard questions we have for that position,	22	A I don't remember exactly, but probably
23	which include questions around the candidate's skills	23	also maybe around 30 minutes.
24	and experience, the logistics of the position, and	24	Q If you could, please explain to me
25	then our faith and standards of conduct section.	25	everything you can remember about the third call or

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1	C. Miolla	1	C. Miolla
2	third non-e-mail communication you had with	2	Now, Ms. Miolla, I'm going to share with
3	Ms. McMahon.	3	you a document which has previously been marked as
4	A I think actually the third time we talked	4	Plaintiff's Exhibit 6.
5	was when I just called her personally and offered her	5	Ms. Miolla, what I'm sharing with you is
6	the job. So I think there were four.	6	a document which was previously marked Plaintiff's
7	Q As for this third communication, do you	7	Exhibit 6. It's a document bearing Bates-stamp
8	recall when that occurred; was that on or about	8	numbers WV 67 through 70. I will represent that this
9	January 4th, 2021?	9	document was exchanged during discovery phase of
10	A Yes, I believe so.	10	litigation in this matter.
11	Q And I'm sorry, I didn't ask you this	11	Please review this document and let me
12	before, but as for that second communication, the	12	know once you've completed.
13	video conference where Mr. Williams was also present,	13	A (Perusing a document)
14	do you recall the date of that video conference?	14	Okay. I've reviewed it.
15	A I don't recall the date.	15	Q Ms. Miolla, do you recognize this
16	Q Do you recall the month and year?	16	document?
17	A I know that it would have been in between	17	A Yes.
18	the phone screen and the offer, so I think it would	18	Q Have you ever seen it before?
19	have been December of 2020.	19	A Yes.
20	Q Okay. And just so we're clear, the	20	Q If you can, and to the extent you know,
21	fourth and final non-e-mail communication that you	21	please explain to me what this document is.
22	had with Ms. McMahon, would that have been the	22	A This is the script of interview
23	telephone call where Melanie Freiberg was also	23	information and questions we used at the time for the
24	present on January the 8th, 2021?	24	customer service representative trainee position, as
25	A Yes.	25	well as Aubry's answers to the questions.
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1	C. Miolla	1	C. Miolla
2	Q And just so we're clear, Ms. Miolla, when	2	in the creation of the language for these topics?
3	you say "we," you're -- could you tell me who the	3	A I don't remember.
4	"we" is; is that World Vision Incorporated?	4	Q Would you say it was more than three?
5	A Yes, World Vision.	5	A Probably not.
6	Q Okay. And so we're clear, I believe that	6	Q If you can recall, when was the script
7	you said that this was the phone screen script that	7	for this phone screening document created? And when
8	was utilized during the phone screening of Aubry	8	I say "when," I'm asking month and year or season and
9	McMahon?	9	year, anything to the best of your recollection.
10	A Yes.	10	MR. WARD: I'm going to object as to
11	Q And you, in fact, conducted that phone	11	form.
12	screening; is that also true?	12	But you may answer.
13	A Yes.	13	A Well, I think it depends on which section
14	Q In Section 1 of this document, a section	14	you're referring to. I don't believe it was all
15	titled "Intro/Logistics," there are certain headings	15	created at the same time.
16	which are in bold and italicized font. One which	16	Q If you can recall, when was the phone
17	reads, "Things to discuss prior to interview	17	screening document that has been marked Plaintiff's
18	questions."	18	Exhibit 6 completed?
19	Do you see those?	19	A Can you explain what you mean by
20	A Yes.	20	"completed"?
21	Q Were you the person who created those	21	Q Well, I'll try to explain it this way.
22	topics to discuss?	22	It would seem that at some point there
23	A I don't remember. I believe I helped	23	was a final draft of a phone screening that would
24	create it.	24	then be utilized in screening candidates for the
25	Q Do you remember how many people assisted	25	customer service trainee representative position.

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1	C. Miolla	1	C. Miolla
2	If you know and if you can recall, when	2	A I participated, yes.
3	did that script or that final draft become finalized?	3	Q Did you speak with Aubry McMahon on a
4	A I believe it would have been become	4	phone screening about these two aforementioned
5	finalized before we started any interviews for this	5	topics -- excuse me, in -- about these aforementioned
6	particular class, so roughly maybe October of 2020.	6	topics in Section 2?
7	Q Now, aside from you, do you know the	7	A Yes.
8	identity of the person or persons who created these	8	Q Now, under each bold font heading in
9	topics for this phone screening document, as in what	9	Section 2 of this phone screening document, there
10	are their names?	10	appear to be some writing suggesting it was a
11	A I don't remember.	11	response by the applicant.
12	Q Did you speak with Aubry McMahon on a	12	Do you see that?
13	phone screening about these two aforementioned topics	13	A Yes.
14	in Section 1?	14	Q In Section 2 underneath each question in
15	A Yes.	15	bold font, were these the responses given by
16	Q In Section 2 of this document, a section	16	Ms. McMahon?
17	titled "Background and Skills," there appear to be a	17	A Yes.
18	number of questions which are in bold font lettering.	18	Q If you know, who wrote these specific
19	The first one being, "Why are you interested in this	19	responses which appear under each question in bold
20	position at World Vision and why do you want to work	20	font in Section 2 of this document?
21	for a call/contact center?"	21	A I typed her answer as she was speaking
22	Do you see those?	22	them.
23	A Yes.	23	Q Now, when you say you typed her answer,
24	Q Did you also participate in the creation	24	did you write it verbatim, did you paraphrase,
25	of these topics for the phone screening document?	25	something else?
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1	C. Miolla	1	C. Miolla
2	A I don't remember exactly. I generally	2	appear in the orange boxes?
3	try to write word for word as best I can.	3	A I don't know specifically.
4	Q So it's fair to say that you tried to	4	Q Were you nevertheless directed to ask
5	give the person's answer as accurate as possible, but	5	these questions as part of the phone screening you
6	not necessarily verbatim; is that more or less	6	conducted when you spoke with Aubry McMahon?
7	accurate?	7	A Yes, I was instructed to ask these
8	A Yes, that's accurate.	8	questions.
9	Q I'd like to turn your attention to	9	Q And if you can recall, who is the person
10	Section 3, a section entitled "Christian Commitment,"	10	or who are the persons who instructed you to ask
11	which appears at the bottom of the second page, and	11	these questions?
12	then goes over onto the subsequent two pages.	12	A This was part of our -- this is part of
13	Do you see that?	13	our script for all job applications, so I wasn't
14	A Yes.	14	instructed by anyone in particular.
15	Q Now, on the third and fourth pages, which	15	Q Was it nevertheless, from your
16	are marked WV 69 and 70 respectively, there appear to	16	recollection, a directive that you answer all
17	be orange boxes that contain questions and then text	17	questions as part of the phone screening, including
18	underneath.	18	the ones that appear in the orange boxes?
19	Do you see that?	19	A Yes.
20	A Yes.	20	MR. WARD: I'll object -- object to form,
21	Q Were you one of the persons who created	21	but that's fine.
22	the questions to ask that appear in the orange boxes?	22	Q And if you can recall, who directed you
23	A No.	23	to ask all questions including the ones that appear
24	Q Do you know the identity of the person or	24	in the red boxes (sic)?
25	the people who created the questions to ask that	25	MR. WARD: Objection as to form.

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<p>1 C. Miolla Page 30</p> <p>2 You may answer.</p> <p>3 A I don't know specific names, but it would</p> <p>4 be like our HR leadership and legal team, I think.</p> <p>5 Q Did you ask these questions which appear</p> <p>6 on the orange boxes on pages WV 69 and 70 to</p> <p>7 Ms. McMahon during your phone screening?</p> <p>8 A Yes.</p> <p>9 Q Do Aubry's responses to these questions</p> <p>10 appear in the respective text in the sections below</p> <p>11 each question?</p> <p>12 A Yes.</p> <p>13 Q Now, I'd like to ask you, please review</p> <p>14 the questions and the answers to those that appear in</p> <p>15 the orange boxes and the text below, and please let</p> <p>16 me know once you've done that.</p> <p>17 A (Perusing a document)</p> <p>18 I'm finished reviewing.</p> <p>19 Q Ms. Miolla, from your recollection, were</p> <p>20 these, in fact, Aubry's responses to each question</p> <p>21 that appears below each orange box on pages 3 and 4</p> <p>22 of Plaintiff's Exhibit 6?</p> <p>23 A I believe so, yes.</p> <p>24 Q Did you write verbatim what Ms. McMahon</p> <p>25 said in response, did you paraphrase, something else?</p>	<p>1 C. Miolla Page 31</p> <p>2 A I did my best to write verbatim.</p> <p>3 Q And how did you enter these responses</p> <p>4 into this document; did you utilize a computer, did</p> <p>5 you handwrite something and then go back and add them</p> <p>6 into a master document, something else?</p> <p>7 A I typed them into a computer.</p> <p>8 Q And when you say "typed them into a</p> <p>9 computer," was the document that you're looking at in</p> <p>10 Plaintiff's Exhibit 6, was it the Word doc?</p> <p>11 A Yes, it was a Word doc.</p> <p>12 MR. WOLNOWSKI: Off the record.</p> <p>13 (Discussion held off the record)</p> <p>14 MR. WOLNOWSKI: Back on.</p> <p>15 Q Ms. Miolla, I'd like to direct your</p> <p>16 attention to the bottom of the third page, namely,</p> <p>17 the fourth bullet down which reads, "Examples of</p> <p>18 behaviors that we believe are not in alignment with</p> <p>19 our standards of conduct and therefore unacceptable</p> <p>20 behavior for employees include," and then the second</p> <p>21 dash down reads, "Any sexual conduct outside of</p> <p>22 marriage; (pause) WV defines marriage as between a</p> <p>23 man and a woman."</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>
<p>1 C. Miolla Page 32</p> <p>2 Q If you know, why is the word "pause"</p> <p>3 written into the document?</p> <p>4 A I don't really know other than that when</p> <p>5 we're reading this as recruiters, we were supposed to</p> <p>6 take a pause at that time.</p> <p>7 Q Now, I don't see any other part of this</p> <p>8 document which directs the reader or the screener, if</p> <p>9 you will, to pause or to do anything which might</p> <p>10 adjust a normal speech pattern.</p> <p>11 Do you know why that is?</p> <p>12 MR. WARD: I'll object as to form.</p> <p>13 But you may answer.</p> <p>14 A I don't know why that is.</p> <p>15 Q It would seem that the pause was</p> <p>16 intentional.</p> <p>17 Now, as a person who had a hand in the</p> <p>18 creation of this document, please tell me everything</p> <p>19 that you can remember about decision -- about the</p> <p>20 decision to include that word "pause" in this</p> <p>21 section.</p> <p>22 MR. WARD: I'll object as to form.</p> <p>23 A I wasn't involved at all in the creation</p> <p>24 of this part.</p> <p>25 Q Understood.</p>	<p>1 C. Miolla Page 33</p> <p>2 Ms. Miolla, did you read this sentence</p> <p>3 after the fourth bullet when you spoke with Ms. --</p> <p>4 Ms. McMahon during your phone screen?</p> <p>5 A Yes.</p> <p>6 Q Okay. Did you read the text after that</p> <p>7 second dash when you spoke with Ms. McMahon during</p> <p>8 her phone screen with you?</p> <p>9 A Yes.</p> <p>10 Q When you initially read that text next to</p> <p>11 that second dash, did Ms. McMahon say anything to</p> <p>12 you?</p> <p>13 A No.</p> <p>14 Q I'd like to focus on the final three</p> <p>15 questions which appear in the three orange boxes on</p> <p>16 the fourth page; the "fourth page" being the one</p> <p>17 that's Bates-stamped WV 70.</p> <p>18 For the words that appear in each of</p> <p>19 these three boxes, did you read these sections to</p> <p>20 Ms. McMahon verbatim, to your recollection?</p> <p>21 A Yes.</p> <p>22 Q Do you have any belief that you may not</p> <p>23 have asked exactly what is written on this page when</p> <p>24 you spoke with Ms. McMahon?</p> <p>25 MR. WARD: Objection as to form.</p>

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1	C. Miolla		C. Miolla
2	You may answer.		A No.
3	A I read these questions exactly as they're		Q Either during the phone screening or at
4	written.		any time before an offer of employment was extended
5	Q And for each response, was the response		to Ms. McMahon, did you personally ever have any
6	as written on this page and below each orange box,		belief that Ms. McMahon was in a same-sex marriage?
7	was that what Ms. McMahon told you verbatim?		MR. WARD: Objection as to form.
8	A Yes.		You may answer.
9	Q Either during the phone screening or at		A No.
10	any time before an offer or employment was extended		Q Either during the phone screening or at
11	to Ms. McMahon, did you personally ever have any		any time before an offer of employment was extended
12	belief that Ms. McMahon was gay?		to Ms. McMahon, did you personally have any belief
13	A No.		that Ms. McMahon was a woman?
14	MR. WARD: I'll object to the form of the		A Yes.
15	question.		Q And how did you form that belief?
16	Q If you understand the question,		A I'm not sure exactly.
17	Ms. Miolla, you can answer.		Q Well, do you recall when you formed that
18	A Can you ask it again?		belief?
19	Q Sure.		A Probably when I reviewed her application.
20	Either during the phone screening or at		Q And if you can explain to me, how is it
21	any time before an offer of employment was extended		that you formed that belief upon reviewing her
22	to Ms. McMahon, did you personally ever have any		application?
23	belief that Ms. McMahon was gay?		A I think I reviewed her name, and then
24	MR. WARD: Same objection.		when I talked with her and how she referred to
25	You may answer.		herself.
		Page 36	Page 37
1	C. Miolla		C. Miolla
2	Q So is it fair to say that the name Aubry		in a same-sex marriage as part of her telephone
3	suggested to you that she may be a woman?		screening, would an offer of employment have been
4	MR. WARD: I'll object as to form.		extended by World Vision Incorporated to Ms. McMahon?
5	You may answer.		MR. WARD: Same objection.
6	A Suggested to me that she may be, yes.		You may answer.
7	Q When you spoke with Ms. McMahon on the		A At this point in the process, I would
8	telephone and you heard her voice, did the sound of		have asked her if she could comply with the standards
9	her voice contribute to your belief that Ms. McMahon		of conduct.
10	was probably a woman?		Q If she had said yes, would an offer of
11	A I think so, yes.		employment have been extended by World Vision to
12	Q Ms. Miolla, to your knowledge and based		Ms. McMahon?
13	on your experience, if Ms. McMahon had disclosed that		MR. WARD: Same objection as to form.
14	she was in a same-sex marriage as part of her		You may answer.
15	telephone -- telephone screening, would an offer of		A If she had said she could comply with the
16	employment have been extended by World Vision to		standards of conduct?
17	Ms. McMahon?		Q Yes.
18	MR. WARD: I'm going to object to the		A We would move forward to the next step if
19	form and calling for speculation.		there were no other concerns.
20	You may answer to the extent you know.		Q What if she had said no?
21	A Can you ask the question again or		MR. WARD: Same objection as to form.
22	rephrase, please?		You may answer.
23	Q Sure.		A If a candidate says that they can't
24	To your knowledge and based on your		comply with the standards of conduct, we don't move
25	experience, if Ms. McMahon had disclosed that she was		them forward.

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1	C. Miolla	1	C. Miolla
2	Q To your knowledge and based on your	2	MR. WARD: Objection to the --
3	experience, if Ms. McMahon had disclosed that she was	3	-- following the phone screen portion?
4	gay as part of her telephone screening, would an	4	MR. WARD: Sorry.
5	offer of employment have been extended by World	5	Objection as to form.
6	Vision Incorporated to Ms. McMahon?	6	You may answer.
7	MR. WARD: I'm going to -- same objection	7	A Can you rephrase that?
8	as to form.	8	MR. WOLNOWSKI: Ms. Ratigan, could you
9	You may answer.	9	read that back? And if rephrase is needed,
10	A My part in this process at this point is	10	I'll do my best.
11	just asking the question of if they comply with the	11	(WHEREUPON, the previous question was
12	standards of conduct.	12	read by the court reporter.)
13	Q So is it fair to say that, at this point	13	Q And to be clear, Ms. Miolla, when I say
14	of -- of the process which is during the phone	14	"you," I mean you personally as in Catherine Miolla.
15	screening, is that you, in essence, are compiling	15	A I'm able to not move someone forward past
16	information to then pass along to a decision maker;	16	the stage if they don't meet the requirements for any
17	is that a fair way to encapsulate what your tasks and	17	reason.
18	responsibilities were?	18	Q After this phone screening with
19	A My responsibility is to gather the	19	Ms. McMahon, which I will represent occurred on or
20	information throughout all of the questions in the	20	about December 4, 2020, what was the next step in
21	phone screen to then move to the next steps which	21	considering Ms. McMahon for employment with World
22	includes the hiring manager as the ultimate decision	22	Vision?
23	maker.	23	A The next step for this position is a
24	Q Did you have the power to flat out deny	24	written, typing speed, and data entry test.
25	somebody's employment solely --	25	Q So if you could, Ms. Miolla, based on
Page 40		Page 41	
1	C. Miolla	1	C. Miolla
2	your knowledge and experience, explain to me the	2	Ms. Miolla, most importantly, is that
3	general process in considering somebody for	3	okay with you?
4	employment as a customer service representative or	4	THE WITNESS: Yes.
5	donor/customer service representative trainee after	5	MR. WOLNOWSKI: All right. So let's just
6	his or her phone screening such as the one in which	6	be back in -- it'll probably be less than five
7	Ms. McMahon was involved on or about December 4,	7	minutes, but let's just say let's be back at
8	2020.	8	1:58; I have 1:53.
9	A The next step is the assessment I just	9	Thank you, everybody. We'll be right
10	mentioned, and then a subsequent interview with a	10	back.
11	leader from the call center.	11	MR. WARD: Okay.
12	Q And then if you could, please explain to	12	(WHEREUPON, a brief recess was taken,
13	me what happens after that; if a person passes both	13	after which the following transpired:)
14	the -- the typing proficiency portion and then that	14	(Time noted: 2:00 p.m.)
15	next interview that you've just described, what is	15	CONTINUED EXAMINATION BY MR. WOLNOWSKI:
16	the next step?	16	Q Ms. Miolla, did you pass this telephone
17	A The next step at that time would be	17	screening document marked as Plaintiff's Exhibit 6
18	references and a background check.	18	along to anybody?
19	Q And assuming the applicant passes the	19	A I believe I just upload it to our
20	references and background check portion, what is the	20	applicant tracking system.
21	next step?	21	Q Do you recall if you notified anybody
22	A I believe the next step is the offer.	22	that either the phone screening had been completed as
23	MR. WOLNOWSKI: If it's all right, we	23	to Aubry McMahon or that you had uploaded the phone
24	should take a quick five-minute break; is that	24	screen document?
25	okay with everybody?	25	A I would have just let the hiring team in

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1	C. Miolla	1	C. Miolla
2	the call center know that we had another candidate	2	Q Do you recall around when that was?
3	ready to interview.	3	A Not exactly.
4	Q And do you recall if you, in fact, did	4	Q To your knowledge and from your
5	that with Aubry McMahon?	5	recollection, please tell me everyone you can
6	A I think that I did.	6	remember who had any role in deciding to extend an
7	Q Okay. And if you can tell me, if you can	7	offer of employment to Aubry McMahon to work for
8	remember, you said that you would have informed a	8	World Vision Incorporated.
9	person or informed a manager.	9	A I don't remember.
10	Do you remember the identity of that	10	Q From your knowledge and from your
11	individual?	11	recollection, was it more than three people?
12	A I don't remember exactly in this scenario	12	A I don't think so.
13	other than Anthony since he was on the next	13	Q So from your knowledge and recollection,
14	interview.	14	it was three or fewer?
15	Q And what was Anthony's last name?	15	A I think so.
16	A Thomas.	16	Q Were you one of the individuals who
17	Q Ms. Miolla, after this phone screen, when	17	recommended an offer of employment be extended to
18	was the next time you learned anything about	18	Aubry McMahon?
19	Ms. McMahon's potential employment with World Vision	19	I was the one who conducted her phone
20	Incorporated?	20	screen and let the hiring team know there weren't
21	A After this phone screen?	21	issues at the time.
22	Q Correct.	22	Q So my question I think is a little more
23	A Well, the next thing I would have learned	23	focussed as to whether or not you recommended an
24	would have been that she passed the written	24	offer of employment be extended.
25	assessment.	25	Are -- are you saying that yes, you were,
Page 44		Page 45	
1	C. Miolla	1	C. Miolla
2	by virtue of those actions you just described?	2	A Yes.
3	MR. WARD: I'm going to object as to	3	MR. WARD: Objection as to form.
4	form.	4	You may answer.
5	But you may answer.	5	Q Do you know who made the ultimate
6	A Well, generally, the hiring decision is	6	decision to extend an offer of employment to Aubry
7	of the hiring manager or the hiring team.	7	McMahon to work at World Vision Incorporated?
8	Q If you can remember, who was the hiring	8	A Can you rephrase that?
9	manager responsible for Aubry McMahon's application	9	Q Do you know who made the ultimate
10	in January 2021 and December of 2020?	10	decision to extend an offer of employment to Aubry
11	A I don't remember the hiring manager, but	11	McMahon to work at World Vision Incorporated?
12	the representative who was part of her interview was	12	And let me back up for a moment, because
13	Anthony.	13	I don't want there to be any confusion.
14	Q Do you recall if Melanie Freiberg played	14	I had previously asked you about who was
15	any role in the determination to extend an offer of	15	involved in the decision-making process, for which
16	employment to Aubry McMahon?	16	you testified and provided answers.
17	A I don't believe so.	17	I'm now asking a slightly different
18	Q Do you recall if Christine Talbot played	18	question, which is whether or not you know who made
19	any role in the decision to extend an offer of	19	the ultimate decision to extend an offer of
20	employment to Aubry McMahon?	20	employment to Aubry McMahon to work at World Vision
21	A I don't believe so.	21	Incorporated.
22	Q At some point, an offer of employment was	22	A I don't think it was necessarily one
23	extended to Ms. McMahon for the position of	23	person making the ultimate decision.
24	donor/customer service representative; is that	24	Q If you can recall, who were the persons
25	correct?	25	who contributed to making the ultimate decision to

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<p>1 C. Miolla</p> <p>2 extend an offer of employment to Aubry McMahon to</p> <p>3 work at World Vision Incorporated?</p> <p>4 A I don't remember anyone specifically</p> <p>5 being involved other than who I've already mentioned.</p> <p>6 Q You reached out to Aubry McMahon on</p> <p>7 January 4th, 2021 to verbally extend her an offer</p> <p>8 with World Vision; is that correct?</p> <p>9 A I believe so, yes.</p> <p>10 Q Well, irrespective of the date, who, if</p> <p>11 anyone, directed you to do that?</p> <p>12 A That would have been like the standard</p> <p>13 next step in our process, so her having passed the</p> <p>14 previous steps would move us to that next step.</p> <p>15 Q So if I'm understanding, there wasn't a</p> <p>16 directive, so to speak, but that you were following</p> <p>17 the protocol that had been created by World Vision;</p> <p>18 is that more or less an accurate description?</p> <p>19 MR. WARD: Objection as to form.</p> <p>20 You may answer.</p> <p>21 A I believe that's accurate.</p> <p>22 Q Ms. Miolla, you sent Aubry McMahon a</p> <p>23 letter on or about January -- well, let me back up.</p> <p>24 When you spoke with Ms. McMahon on</p> <p>25 January 4th, if you could, please explain to me</p>	<p>Page 46</p> <p>1 C. Miolla</p> <p>2 everything you can remember about that conversation.</p> <p>3 A I don't remember specifics other than</p> <p>4 letting her know that she was being extended the job</p> <p>5 offer and that I would be sending the written offer</p> <p>6 letter.</p> <p>7 Q And how long did that telephone</p> <p>8 conversation last?</p> <p>9 A I don't remember.</p> <p>10 Q Would you say it was shorter than three</p> <p>11 minutes?</p> <p>12 A Probably.</p> <p>13 Q In response to you telling her that she</p> <p>14 would be extended an offer, from your recollection,</p> <p>15 what, if anything, did Aubry say to you in response?</p> <p>16 A I don't remember what she said.</p> <p>17 Q And do you recall if she accepted the</p> <p>18 position?</p> <p>19 A I don't remember if she did on that phone</p> <p>20 call.</p> <p>21 Q Did she say that she was looking forward</p> <p>22 to working at World Vision or something to that end?</p> <p>23 A I don't remember.</p> <p>24 Q Ms. Miolla, you sent Aubry McMahon a</p> <p>25 letter on or about January 5th, 2021 which served as</p>
<p>1 C. Miolla</p> <p>2 a written confirmation of the verbal offer made to</p> <p>3 her for the position of donor/customer service</p> <p>4 representative with -- trainee with World Vision; is</p> <p>5 that correct?</p> <p>6 A Yes.</p> <p>7 Q I'd like to show what has been previously</p> <p>8 marked as Plaintiff's Exhibit Number 2.</p> <p>9 This is a document which is Bates-stamped</p> <p>10 WV 78 to 79. I will represent that this document was</p> <p>11 exchanged during the discovery phase of litigation in</p> <p>12 this matter.</p> <p>13 If you could, please review this document</p> <p>14 and let me know once you've completed doing so.</p> <p>15 A (Perusing a document)</p> <p>16 I've completed reviewing it.</p> <p>17 Q Ms. Miolla, do you recognize this</p> <p>18 document?</p> <p>19 A Yes.</p> <p>20 Q Have you ever seen it before?</p> <p>21 A Yes.</p> <p>22 Q Is this letter a written confirmation of</p> <p>23 an offer of employment for Aubry McMahon to work for</p> <p>24 World Vision Incorporated?</p> <p>25 A It's a written confirmation of her offer</p>	<p>Page 48</p> <p>1 C. Miolla</p> <p>2 to be a donor/customer service representative</p> <p>3 trainee.</p> <p>4 Q In the first sentence of this document,</p> <p>5 it states that the job itself was to commence on</p> <p>6 February 1st, 2021.</p> <p>7 Is that the -- correct that this document</p> <p>8 states that?</p> <p>9 A Yes.</p> <p>10 Q Is it accurate that the job itself would</p> <p>11 indeed commence on February 1st, 2021?</p> <p>12 A That's when the training would have</p> <p>13 started, yes.</p> <p>14 Q And at the bottom of page 1 of this</p> <p>15 document, it bears your name -- correction, excuse</p> <p>16 me. Let me go back.</p> <p>17 Not of page 1, but as of the first page,</p> <p>18 the one marked WV 78, it bears your name; correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. In January of 2021, did you</p> <p>21 regularly send out letters bearing your name at the</p> <p>22 bottom such as the one marked as Plaintiff's Exhibit</p> <p>23 Number 2?</p> <p>24 A Yes.</p> <p>25 Q Do you know why your name appears there</p>

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<p>1 C. Miolla Page 50</p> <p>2 as opposed to somebody else's?</p> <p>3 A Not really, other than that I was the</p> <p>4 assigned recruiter.</p> <p>5 Q And this document was sent via a version</p> <p>6 that was DocuSign; correct?</p> <p>7 A I believe so.</p> <p>8 MR. WOLNOWSKI: Off the record.</p> <p>9 (Discussion held off the record)</p> <p>10 MR. WOLNOWSKI: Back on.</p> <p>11 Q Ms. Miolla, do you know if Aubry McMahon</p> <p>12 ever returned a signed copy of this letter, whether</p> <p>13 it be via DocuSign or otherwise?</p> <p>14 A I don't think she did.</p> <p>15 Q Now, Ms. Miolla, that same day,</p> <p>16 January 5th, 2021, Aubry McMahon sent you an e-mail;</p> <p>17 correct?</p> <p>18 A I believe so, yes.</p> <p>19 Q Do you recall receiving an e-mail from</p> <p>20 Ms. McMahon on or about January 5th, 2021 disclosing</p> <p>21 to you that she was pregnant?</p> <p>22 A I remember getting the e-mail, but I</p> <p>23 don't remember exactly what it said.</p> <p>24 Q So as you sit here today, you don't</p> <p>25 recall whether or not you received an e-mail on</p>	<p>1 C. Miolla Page 51</p> <p>2 January 5th, 2021 disclosing to you that Ms. McMahon</p> <p>3 was pregnant?</p> <p>4 A I can't remember the exact content of the</p> <p>5 e-mail.</p> <p>6 Q I'm sorry, could you repeat that? You</p> <p>7 broke up just a tad.</p> <p>8 (WHEREUPON, the requested portion of the</p> <p>9 testimony was read by the court reporter.)</p> <p>10 MR. WOLNOWSKI: Thank you.</p> <p>11 Q Do you recall receiving an e-mail from</p> <p>12 Ms. McMahon on or about January 5th, 2021 disclosing</p> <p>13 to you that she was expecting her first baby in March</p> <p>14 of that year?</p> <p>15 A I don't remember if it included that</p> <p>16 specific de- -- those specific details.</p> <p>17 Q Do you recall receiving an e-mail from</p> <p>18 Ms. McMahon on or about January 5th asking you if she</p> <p>19 would qualify for time off since she'll be a new</p> <p>20 employee?</p> <p>21 A I remember she asked something about time</p> <p>22 off, but I don't remember exactly what she asked.</p> <p>23 Q Do you recall receiving an e-mail from</p> <p>24 Ms. McMahon on or about January 5th, 2021 disclosing</p> <p>25 to you that she had a wife?</p>
<p>1 C. Miolla Page 52</p> <p>2 A I don't remember exactly what was in the</p> <p>3 e-mail. I believe the word "wife" was in the e-mail.</p> <p>4 Q Do you recall receiving an e-mail from</p> <p>5 Ms. McMahon on or about January 5th, 2021 disclosing</p> <p>6 that she was LGBTQ?</p> <p>7 MR. WARD: Objection as to form.</p> <p>8 You may answer.</p> <p>9 A I don't remember the specifics of that</p> <p>10 being in the e-mail.</p> <p>11 Q One moment. Bear with me, please,</p> <p>12 Ms. Miolla.</p> <p>13 Thank you for your patience, Ms. Miolla.</p> <p>14 I'd like to show you what is marked as</p> <p>15 Plaintiff's Exhibit 3. It's a document that bears</p> <p>16 Bates-stamp Number WV 80. I will represent that this</p> <p>17 document was exchanged during the discovery phase of</p> <p>18 litigation in this matter.</p> <p>19 If you could, please review this document</p> <p>20 and let me know once you've completed doing so.</p> <p>21 A (Perusing a document)</p> <p>22 I've reviewed the document.</p> <p>23 Q Do you recognize this document?</p> <p>24 A Yes.</p> <p>25 Q Have you ever seen it before?</p>	<p>1 C. Miolla Page 53</p> <p>2 A Yes.</p> <p>3 Q Did you receive this e-mail from Aubry</p> <p>4 McMahon on January 5th of 2021?</p> <p>5 A I believe so, yes.</p> <p>6 Q Now that you've had a chance to review</p> <p>7 it, does this e-mail disclose to you that Ms. McMahon</p> <p>8 was pregnant?</p> <p>9 A I believe so.</p> <p>10 Q Well, she does state, "I will be the one</p> <p>11 having the baby."</p> <p>12 In light of this, does that help clarify</p> <p>13 as to whether or not in this e-mail Ms. McMahon was</p> <p>14 advising you that she was pregnant?</p> <p>15 A Can you ask the question again?</p> <p>16 MR. WOLNOWSKI: Ms. Ratigan, could you</p> <p>17 please read it back?</p> <p>18 (WHEREUPON, the previous question was</p> <p>19 read by the court reporter.)</p> <p>20 A I -- I believe so, yes.</p> <p>21 Q In reviewing this e-mail and in light of</p> <p>22 your prior answers, does this e-mail help clarify as</p> <p>23 to whether or not Ms. McMahon asked you if she</p> <p>24 qualified for any time off?</p> <p>25 A Yes.</p>

Catherine Miolla

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1	C. Miolla	1	C. Miolla
2	Q In light of reviewing this e-mail and in	2	MR. WARD: Same objection.
3	light of your prior testimony, does this e-mail	3	You may answer.
4	disclose to you that Ms. McMahon was expecting her	4	A I think I just recognized that I needed
5	first baby in March?	5	to get guidance on how to respond.
6	A Yes.	6	Q I think my question is, as you read the
7	Q In reviewing this e-mail and in light of	7	e-mail now, do you believe that, in reading this
8	your prior testimony, does this e-mail disclose to	8	e-mail, that you were informed that somebody may be
9	you that Ms. McMahon had a wife?	9	gay?
10	A Yes.	10	MR. WARD: I'm going to object as to form
11	Q In reviewing this e-mail and in light of	11	and as argumentative and as to relevance.
12	your prior testimony, does this e-mail disclose that	12	But you may answer to the extent you
13	she is LGBTQ --	13	know.
14	MR. WARD: Objection --	14	A I just know the facts of the e-mail.
15	Q -- in your opinion?	15	Q And what are the facts of the e-mail?
16	MR. WARD: Objection as to form.	16	A That she has a question, that she has a
17	You may answer.	17	wife, that she's expecting her first baby in March.
18	A Well, I just know the facts of the	18	Q When you first read this, from your
19	e-mail, which indicate that she has a wife.	19	recollection in Jan- -- on January 5th, 2021, did you
20	Q Did you formulate an opinion upon reading	20	think that Aubry McMahon might be gay?
21	this as to whether or not Aubry McMahon may be gay?	21	MR. WARD: Objection as to form.
22	MR. WARD: Objection as to form.	22	You may answer.
23	You may answer.	23	A I just remember thinking that I needed
24	A I don't remember.	24	guidance from my leadership. I don't remember my
25	Q Well, as you read it now?	25	thoughts other than that.
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1	C. Miolla	1	C. Miolla
2	Q And why did you conclude that you needed	2	woman.
3	guidance from leadership?	3	Q Did you think there were any questions
4	A She just had several questions that I	4	which potentially needed to be addressed in light of
5	felt like I wasn't able to answer on my own.	5	the fact that Aubry McMahon might be gay?
6	Q And what were those questions?	6	MR. WARD: Objection as to form.
7	A Well, her question really was to take	7	A I don't know.
8	time off.	8	Q So it's not a definitive no, is what
9	Q Any other questions?	9	you're saying; correct?
10	A Not explicitly in this e-mail.	10	MR. WARD: Objection as to form.
11	Q So upon reading this, you didn't think	11	A I'm not sure.
12	that there were any questions which needed to be	12	Q And why would Aubry McMahon's sexual
13	addressed in light of the fact that she might be in a	13	orientation of being gay have anything to do with
14	same-sex marriage; is that correct?	14	whether or not she could work for World Vision --
15	A I wanted guidance as to how to move	15	MR. WARD: Objection.
16	forward if she were to be -- if there were to be	16	Q -- in January of 2021?
17	issues with anything related to the standards of	17	MR. WARD: Objection; form,
18	conduct.	18	argumentative.
19	Q And what standards of conduct in	19	A I just felt like I needed to talk with my
20	particular did you think there may be questions	20	management about if she was in alignment with the
21	surrounding?	21	standards of conduct as well as her time off
22	A Potentially the statement in the	22	question.
23	standards of conduct which at the time read as any	23	Q From your recollection in January of
24	sexual conduct outside of a marriage with World	24	2021, what, if anything, did the standards of conduct
25	Vision believing marriage to be between a man and a	25	say about a person who is LGBTQ working for World

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1		C. Miolla	C. Miolla
2	Vision?	MR. WARD: Objection as to form.	Q Did Melanie Freiberg come into possession
3		You may answer.	of this e-mail in any way, from your recollection?
4		A The standards of conduct doesn't use that	A I don't remember.
5		language. It reads as we read earlier.	Q Do you recall whether or not you
6		7 Q Was there ever any discussion about	forwarded it on to her?
7		8 bringing it to the attention of managers or	A I don't recall.
8		9 supervisors if somebody disclosed that they were gay?	Q Upon notifying Melanie Freiberg as to the
9		10 MR. WARD: Objection as to form.	existence of this e-mail, what, if anything, did she
10		11 A Can you ask that again?	say to you with respect to the content of the e-mail?
11		12 Q Sure.	A I don't remember her saying anything
12		13 Was there any policy or protocol in place	about the content.
13		14 in January of 2021 to address a potential applicant	Q Well, if you can, just explain to me the
14		15 as being gay with a manager or supervisor?	first time that you spoke with her about this e-mail
15		16 MR. WARD: Objection as to form.	from Aubry McMahon on January the 5th.
16		17 A No.	A All I remember is letting her know the
17		18 Q Upon receiving this e-mail, what is the	content of the e-mail and asking her how I should
18		19 first thing that you did?	move forward.
19		20 A I believe I talked to my manager, Melanie	Q And what did she say in response to that?
20		21 Freiberg.	A I believe she said that we should talk to
21		22 Q And what did you -- what did you say to	our legal team.
22		23 her?	Q How long did that conversation last with
23		24 A I let her know this was the e-mail I	Melanie Freiberg?
24		25 received and asked her how I should move forward.	A I don't remember.
25			Q Would you say it was less than three
		Page 60	Page 61
1		C. Miolla	C. Miolla
2	minutes?	1 I don't remember.	2 point, it's just badgering the witness.
3	A	2 Q Would you say it was more than three	3 MR. WOLNOWSKI: If the witness
4		5 minutes?	4 understands the question, she can answer it.
5	A	6 A I don't remember the length of the call.	5 Q I'd like to show you what has been marked
6		7 Q Was it more than ten minutes?	7 as Plaintiff's Exhibit Number 4.
7	A	8 A Ms. Miolla, I'd like to show you what is	8 marked as Plaintiff's Exhibit Number 4. It is a
8		9 document that is Bates-stamped WV 231 to 232. I will	9 represent that this is a document that was exchanged
9	A	10 during the discovery phase of litigation in this	10 matter.
10		11 Q So from your recollection, it could have	11 Please review this document and let me
11		12 been anywhere from a couple of seconds to 20 minutes?	12 know once you've completed doing so.
12	MR. WARD: Objection as to form. It	13 A (Perusing a document)	13
13	mischaracterizes.	14 I've finished reviewing it.	14
14	A I don't remember anything more specific	15 Q Do you recognize this document?	15
15	than that in terms of the length.	16 A Yes.	16
16	Q So is it fair to say that the	17 Q Have you ever seen it before?	17
17	conversation could have lasted only a couple minutes?	18 A Yes.	18
18	Q Is it fair to say the conversation could	19 Q This appears to be an e-mail chain	19
19	have lasted 20 minutes?	20 between you and Melanie Freiberg regarding Aubry	20
20	MR. WARD: Objection as to form. And,	21 McMahon; would you agree?	21
21	Counsel, I think this has been asked and	22 A Yes.	22
22	answered. You've gotten a consistent response	23 Q	23
23	to every variation on the theme. At this	24	24
24		25 A Yes.	25

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1	C. Miolla	1	C. Miolla
2	Q In January of 2021, who was Melanie	2	Melanie Freiberg want to be on a call with Aubry
3	Freiberg?	3	McMahon?
4	A She was my direct manager.	4	A I think so.
5	Q From your recollection, did she hold the	5	Q Do you know why?
6	position of director talent management, HR for World	6	A I don't remember exactly why.
7	Vision?	7	Q Did she ever explain to you why?
8	A I believe so, yes.	8	A I don't remember.
9	Q Was she your supervisor in January of	9	Q Ms. Miolla, I'd like to show you what
10	2021?	10	will be -- excuse me, what has been marked as
11	A Yes.	11	Plaintiff's Exhibit 5. It's a document bearing
12	Q Was she your boss in January of 2021?	12	Bates-stamped number WV 2858. Ms. Miolla, I will
13	A Yes.	13	represent that this document was exchanged during the
14	Q On January 5th, 2021 at 3:07 p.m.,	14	discovery phase of litigation in this matter.
15	Melanie Freiberg e-mailed you and asked you to send	15	If you could, please review this document
16	Aubry an e-mail to connect on the telephone; is that	16	and let me know once you've completed doing so.
17	correct?	17	A (Perusing a document)
18	A Yes.	18	I've completed review.
19	Q Do you know why she asked you to do that?	19	Q Do you recognize this document?
20	A I don't remember exactly.	20	A Yes.
21	Q Did Melanie Freiberg want to be on a	21	Q Have you ever seen it before?
22	telephone call with Aubry McMahon?	22	A Yes.
23	MR. WARD: Objection as to form.	23	Q This document appears to be an e-mail
24	A Can you ask that again?	24	sent by you to Melanie Freiberg at 11 o'clock p.m. in
25	Q If you know and if you recall, did	25	which you wrote in the body, "Hi Melanie, Aubry's
	Page 64		Page 65
1	C. Miolla	1	C. Miolla
2	phone interview is attached. The standards of	2	Plaintiff's Exhibit Number 6?
3	conduct section with her responses is the last	3	A I think so.
4	section. Let me know if you need anything else."	4	Q Well, was there a separate phone screen
5	Do you see that?	5	document that was in existence aside from the one
6	A Yes.	6	that I showed you marked Plaintiff's Exhibit 6?
7	Q Did you write that?	7	A No.
8	A I believe so.	8	Q Why did you attach that document to this
9	Q Do you have any reason to doubt that this	9	e-mail?
10	is an e-mail that you sent to Melanie Freiberg on	10	A I think Melanie asked to see it.
11	January 5th?	11	Q If you can recall, when did Ms. Freiberg
12	A No.	12	ask you to send it to her?
13	Q It appears as though there was an	13	A When?
14	attachment to this e-mail entitled "Aubry Atwood	14	Q Yes, when. As in if you can recall the
15	phone screen," and it appears to be a .doc document.	15	day, the time, anything else you can recall.
16	Do you see that?	16	A I don't remember.
17	A Yes.	17	Q If you can, tell me everything you can
18	Q Did you attach that document to this	18	remember about the communication in which she asked
19	January 5th e-mail?	19	or directed you to send her the phone screen
20	A I believe so, yes.	20	document.
21	Q Do you have any reason to doubt that you	21	A I don't remember any of it.
22	attached that document to this January 5th e-mail?	22	Q Do you recall if it was something that
23	A No.	23	was requested via telephone?
24	Q Is the attachment to that e-mail the same	24	A I don't remember.
25	document I previously showed you, which was marked	25	Q Did you ever ask or inquire with Melanie

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1	C. Miolla	1	C. Miolla
2	Freiberg, or anyone else for that matter, why she or	2	not present, tell me everything you can remember
3	they wanted to see the Aubry McMahon phone screen	3	about those conversations.
4	document?	4	A I don't remember any of the
5	MR. WARD: Objection as to form.	5	conversations.
6	You may answer.	6	Q So the conversations that you had with
7	A No, I don't think so.	7	Melanie Freiberg and/or Christine Talbot between
8	Q Now, Ms. Miolla, this is a long question,	8	January 5th of 2021 and January 8th, 2021, your
9	so bear with me.	9	testimony here today is that you can't remember
10	From the time you received the	10	anything that was discussed in any of those
11	January 5th, 2021 e-mail from Aubry McMahon through	11	conversations regarding Aubry McMahon?
12	January 8th of 2021, approximately how many	12	MR. WARD: Objection as to form.
13	conversations with either Melanie Freiberg, Christine	13	A No, I don't remember any specifics.
14	Talbot, or both did you have regarding Aubry McMahon	14	Q Well, not about specifics. I'm asking
15	whether it be over the phone, via video conference,	15	you whether you remember anything about those
16	in person, or otherwise?	16	conversations.
17	A I don't remember.	17	MR. WARD: Objection as to form.
18	Q Would you say it was fewer than three?	18	A I don't remember anything other than what
19	A I don't remember.	19	I've already shared.
20	Q Would you say it was between four and	20	Q From your recollection, how many times
21	ten?	21	did the issue of Aubry McMahon potentially being in a
22	A Possibly.	22	same-sex marriage come up during those conversations
23	Q Would you say it was between 11 and 15?	23	with either Melanie Freiberg, Christine Talbot, or
24	A I don't think so.	24	both from January 5th to January 8th, 2021 in which
25	Q For the ones in which legal counsel was	25	you were either a participant or present?
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1	C. Miolla	1	C. Miolla
2	MR. WARD: Objection as to form.	2	Does that work for you, Mr. Ward?
3	You may answer.	3	MR. WARD: I think that works.
4	A I don't remember.	4	Thank you.
5	Q Would you say it was one or more?	5	MR. WOLNOWSKI: All right. Thank you.
6	A I don't remember.	6	(WHEREUPON, a brief recess was taken,
7	Q Would you say it was more than five?	7	after which the following transpired:)
8	A I don't remember.	8	(Time noted: 2:49 p.m.)
9	Q So as you testify here today, it could	9	MR. WOLNOWSKI: We're back on the record.
10	have been zero; is that fair to say?	10	CONTINUED EXAMINATION BY MR. WOLNOWSKI:
11	MR. WARD: I'm going to object as to	11	Q We just took a seven-minute break there.
12	form.	12	During the break, Ms. Miolla, did you
13	But you may answer.	13	speak with anybody?
14	A It's possible it was zero. I don't	14	A No.
15	remember.	15	Q What did you do during the break?
16	Q Okay.	16	A I went to the bathroom and pet my cat.
17	MR. WARD: I'm -- I'm going to want to	17	Q What's your cat's name?
18	take a break now since there's no question	18	A Muffin.
19	pending.	19	Q That's a good name.
20	So should we take about five minutes?	20	MR. WOLNOWSKI: Could we go off the
21	MR. WOLNOWSKI: Absolutely.	21	record for a moment?
22	Is that okay with you, Ms. Miolla?	22	(Discussion held off the record)
23	THE WITNESS: Yes.	23	MR. WOLNOWSKI: Back on.
24	MR. WOLNOWSKI: All righty. Let's circle	24	Q Ms. Miolla, from January 5th to
25	back at 2:47.	25	January 8th of 2021, in your conversations with

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<p>1 C. Miolla Page 70</p> <p>2 Melanie Freiberg or Christine Talbot, how many times</p> <p>3 did the issue of Aubry McMahon potentially being gay</p> <p>4 come up during those conversations in which you were</p> <p>5 either a participant or present?</p> <p>6 MR. WARD: I'm going to object to form.</p> <p>7 A I don't remember.</p> <p>8 Q Did it come up at all, from your</p> <p>9 recollection?</p> <p>10 MR. WARD: Same objection.</p> <p>11 A I don't remember.</p> <p>12 Q So it could have come up and you just</p> <p>13 don't remember, instead of definitively saying it</p> <p>14 never came up; is that accurate?</p> <p>15 MR. WARD: Same objection.</p> <p>16 A I'm not sure.</p> <p>17 Q Ms. Miolla, I'd like to show you what has</p> <p>18 been previously marked as Plaintiff's Exhibit</p> <p>19 Number 7. It is a document which bears Bates-stamp</p> <p>20 Number WV 240 to 241.</p> <p>21 If you can, please review this document</p> <p>22 and let me know once you've completed doing so.</p> <p>23 If I haven't mentioned already, I will</p> <p>24 represent that this document was exchanged during the</p> <p>25 discovery phase of litigation in this matter.</p>	<p>1 C. Miolla Page 71</p> <p>2 A (Perusing a document)</p> <p>3 I've reviewed the document.</p> <p>4 Q Okay. Ms. Miolla, have you ever seen</p> <p>5 this document before?</p> <p>6 A Not as a document.</p> <p>7 Q If you can, please explain to me how</p> <p>8 you've seen it in non-document form.</p> <p>9 A I think I remember it as like a meeting</p> <p>10 invite.</p> <p>11 Q At some point between January 5th and</p> <p>12 January 8th of 2021, Melanie Freiberg sent an e-mail</p> <p>13 to both you and Christine Talbot to join a</p> <p>14 RingCentral meeting; is that correct?</p> <p>15 MR. WARD: Objection as form.</p> <p>16 You may answer.</p> <p>17 A I think so based on this.</p> <p>18 Q Do you recall receiving that invite?</p> <p>19 A Sort of.</p> <p>20 Q After having seen Plaintiff's Exhibit 7,</p> <p>21 does this refresh your recollection as to whether or</p> <p>22 not you received a RingCentral invite from Melanie</p> <p>23 Freiberg?</p> <p>24 A Yes.</p> <p>25 Q From your recollection, when did you</p>
<p>1 C. Miolla Page 72</p> <p>2 receive this RingCentral invite?</p> <p>3 A I don't remember.</p> <p>4 Q Do you recall the date?</p> <p>5 A No, I don't remember.</p> <p>6 Q Do you recall if it was sometime between</p> <p>7 January 5th and January 8th of 2021?</p> <p>8 A I don't remember.</p> <p>9 Q The subject line of the invite which is</p> <p>10 in Plaintiff's Exhibit 7 states, "Dry run,</p> <p>11 Christine/Melanie/Christine"; correct?</p> <p>12 A Yes.</p> <p>13 Q Now, before we get into the meeting</p> <p>14 itself, who is Christine Talbot?</p> <p>15 A Christine Talbot was our senior vice</p> <p>16 president of human resources.</p> <p>17 Q In January of 2021, was Christine Talbot</p> <p>18 your supervisor?</p> <p>19 A No.</p> <p>20 Q Was she your supervisor's supervisor?</p> <p>21 A Yes.</p> <p>22 Q In January of 2021, was Christine Talbot</p> <p>23 your boss?</p> <p>24 A No.</p> <p>25 Q Did you attend the dry run RingCentral</p>	<p>1 C. Miolla Page 73</p> <p>2 meeting that is the subject of this invite?</p> <p>3 A I don't remember.</p> <p>4 Q Irrespective of it being a dry run or a</p> <p>5 RingCentral meeting, do you recall having some kind</p> <p>6 of meeting with Melanie Freiberg and Christine Talbot</p> <p>7 in or around early January of 2028 relating -- excuse</p> <p>8 me, in or around January 5th to January 8th of 2021</p> <p>9 relating to Aubry McMahon?</p> <p>10 A I don't remember.</p> <p>11 Q Do you remember any meetings in which a</p> <p>12 dry run of something was discussed?</p> <p>13 A I don't remember.</p> <p>14 Q I'd like to show you a document which is</p> <p>15 marked Plaintiff's Exhibit Number 8. I can represent</p> <p>16 to you, Ms. Miolla, that this document bears</p> <p>17 Bates-stamped Numbers WV 242 to 244, and it is a</p> <p>18 document which was exchanged during the discovery</p> <p>19 phase of this litigation in this case.</p> <p>20 If you could, please review this document</p> <p>21 and let me know once you've completed doing so.</p> <p>22 A (Perusing a document)</p> <p>23 I've reviewed the document.</p> <p>24 Q Do you recognize this document?</p> <p>25 A Sort of.</p>

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1	C. Miolla	1	C. Miolla
2	Q Have you ever seen it before?	2	Q On or about January 6th, 2021 or
3	A I think so.	3	thereafter, did you ever practice anything with
4	Q Plaintiff's Exhibit 8 seems to be an	4	Christine Talbot?
5	e-mail chain involving you, Melanie Freiberg, and	5	A I don't remember.
6	Christine Talbot which took place on January 6th,	6	Q Do you recall receiving this e-mail?
7	2021 in the morning.	7	A I didn't remember until you showed it to
8	Would you agree?	8	me.
9	A Yes.	9	Q In light of me showing it to you, does it
10	Q In these e-mails, Christine Talbot	10	refresh your recollection as to whether or not you
11	mentions something about reviewing a script.	11	received this e-mail?
12	Do you see that?	12	A Yes.
13	A Yes.	13	Q Do you recall after having reviewed it
14	Q Do you know to what she was referring in	14	that you did indeed receive this e-mail on or about
15	this e-mail relating to a script?	15	8:43 a.m. in the morning on January 6th, 2021?
16	A No, I don't remember.	16	A Yes, I think so.
17	Q In this e-mail dated January 6th, 2021 at	17	Q Well, in light of reviewing it now, does
18	8:43 a.m. to you and Ms. Freiberg, Christine Talbot	18	it refresh your recollection about you and/or Melanie
19	mentions offering to practice with you.	19	and Christine Talbot discussing anything involving a
20	Do you see that?	20	script on or about January 6th, 2021?
21	A Yes.	21	A I don't remember anything other than
22	Q Do you know to what she was referring in	22	what's being shown here.
23	this e-mail relating to practicing something with	23	Q In rejecting applicants in general in
24	you?	24	January of 2021, was it common practice that a script
25	A I don't remember.	25	would be utilized in informing him or her that an
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1	C. Miolla	1	C. Miolla
2	offer was being rescinded?	2	A I'm not sure.
3	MR. WARD: Objection as to form.	3	Q If you can look at the top of the second
4	You may answer.	4	page, that's page WV 243, Melanie Freiberg e-mailed
5	A I don't think I've ever been involved in	5	Christine Talbot, and you were on that e-mail. It's
6	an offer being rescinded other than this time, so I	6	an e-mail dated January 6th, 2021, was sent at
7	don't know.	7	9:46 a.m. Melanie writes -- to the extent you can
8	Q In your experience at World Vision, how	8	read -- I know there's a portion that's chopped
9	many offers have been extended in which you have been	9	off -- "Christine, thank you so much for the words of
10	a participant in some way, shape, or form?	10	encouragement," and mentions that she would love to
11	A Offers extended?	11	take her up on her offer to practices.
12	Q Correct. As in offer were made.	12	In reviewing this, does it refresh your
13	A Hundreds.	13	recollection as to whether or not either you or
14	Q When you say "hundreds," that could mean	14	Melanie Freiberg practiced anything with Christine
15	anywhere from 200 to 900.	15	Talbot around January 6th or January 7th of 2021?
16	Could you try to be a little more	16	A I don't remember.
17	precise; is it between 2- and 400, 400 and 600, 6- to	17	Q Ms. Miolla, I'd like to show you a
18	800, something else?	18	document which has been marked Plaintiff's Exhibit 9.
19	A I'm not sure.	19	I can represent to you that it is a document bearing
20	Q Was it more -- is it -- has it been more	20	Bates-stamped Numbers WV 81 to 82. It is a document
21	than 200?	21	which has been exchanged during the discovery phase
22	A Possibly.	22	of litigation in this case.
23	Q Has it been more than 400?	23	If you could, please review this document
24	A I'm not sure.	24	and let me know once you've completed doing so.
25	Q Has it been more than 600?	25	A (Perusing a document)

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<p>1 C. Miolla Page 78</p> <p>2 I've finished reviewing.</p> <p>3 Q Ms. Miolla, do you recognize the document</p> <p>4 that I have shown you which has been marked</p> <p>5 Plaintiff's Exhibit 9?</p> <p>6 A Yes.</p> <p>7 Q Have you ever seen it before?</p> <p>8 A Yes.</p> <p>9 Q This document appears to be an e-mail</p> <p>10 chain between you and Aubry McMahon beginning</p> <p>11 January 5th of 2021 and ending January 8th, 2021.</p> <p>12 Would you agree?</p> <p>13 A Yes.</p> <p>14 Q And is it correct that the latest e-mail</p> <p>15 appears at the end of the second page, and the most</p> <p>16 recent e-mail appears at the top of the first page?</p> <p>17 A Yeah, that looks to be correct.</p> <p>18 Q I'd like to direct your attention to the</p> <p>19 middle section of the second page, that page being</p> <p>20 marked WV 82. It is an e-mail which you sent to</p> <p>21 Ms. McMahon on January 5th, 2021 at 4:59 p.m., and it</p> <p>22 reads, "Hi Aubry, thank you for your e-mail and</p> <p>23 questions. Do you have time tomorrow afternoon to</p> <p>24 discuss by phone? I have a few interviews scheduled,</p> <p>25 but could give you a call around 4:00 p.m. EST if</p>	<p>1 C. Miolla Page 79</p> <p>2 that would work for you? Thanks, Catherine."</p> <p>3 Did you indeed send that e-mail to</p> <p>4 Ms. McMahon?</p> <p>5 A Yes.</p> <p>6 Q Why did you send her that e-mail?</p> <p>7 A I believe I was given guidance to talk</p> <p>8 with her on the phone about her questions.</p> <p>9 Q Who gave you that guidance?</p> <p>10 A I don't remember exactly. I think it may</p> <p>11 have been Melanie and our legal team.</p> <p>12 Q And what kind of guidance was Melanie</p> <p>13 asking you to get from Aubry McMahon?</p> <p>14 MR. WARD: I'm going to object to the</p> <p>15 question to the extent that it calls for any</p> <p>16 attorney/client privileged information and</p> <p>17 instruct the witness not to answer as to any</p> <p>18 communications that either involved counsel or</p> <p>19 involved counsel's legal advice.</p> <p>20 To the extent there's anything remaining</p> <p>21 after that, you may answer.</p> <p>22 MR. WOLNOWSKI: Well, the question</p> <p>23 involved Melanie Freiberg.</p> <p>24 MR. WARD: Yes. But the witness just</p> <p>25 testified that some of the conversation</p>
<p>1 C. Miolla Page 80</p> <p>2 involved a counselor -- that they sought</p> <p>3 guidance from counsel. So it's quite possible</p> <p>4 that Ms. Freiberg's advice includes or</p> <p>5 incorporates advice of counsel.</p> <p>6 It's an appropriate objection and an</p> <p>7 appropriate instruction.</p> <p>8 MR. WOLNOWSKI: And if she understands</p> <p>9 the question, she can answer.</p> <p>10 MR. WARD: To the --</p> <p>11 Q You understand the question, Ms. --</p> <p>12 MR. WARD: To the --</p> <p>13 Q -- Miolla?</p> <p>14 MR. WOLNOWSKI: You've made your</p> <p>15 objection.</p> <p>16 Thank you.</p> <p>17 MR. WARD: To the extent it does not call</p> <p>18 for privileged information. So when you say</p> <p>19 she may answer, you have to include that,</p> <p>20 Counsel. You understand that as well as I do.</p> <p>21 MR. WOLNOWSKI: You've made your</p> <p>22 objection.</p> <p>23 Q In light of the question and counselor's</p> <p>24 objection, you can answer, Ms. Miolla.</p> <p>25 MR. WARD: To the extent that it does not</p>	<p>1 C. Miolla Page 81</p> <p>2 involve privileged information.</p> <p>3 MR. WOLNOWSKI: You've made your</p> <p>4 objection multiple times.</p> <p>5 Thank you, Mr. Ward.</p> <p>6 MR. WARD: Mr. Wolnowski, then give your</p> <p>7 question accurately. You've done that before.</p> <p>8 Do the question correctly.</p> <p>9 Q Ms. Miolla, please answer in light of the</p> <p>10 question and the objection posed.</p> <p>11 A I don't even remember the question.</p> <p>12 Can you please repeat?</p> <p>13 MR. WOLNOWSKI: Ms. Ratigan, could you</p> <p>14 please repeat the question?</p> <p>15 (WHEREUPON, the previous question was</p> <p>16 read by the court reporter.)</p> <p>17 MR. WARD: Same objections.</p> <p>18 A I don't remember any guidance that was</p> <p>19 just from Melanie.</p> <p>20 Q When you say "that was just from</p> <p>21 Melanie," could you please explain what "that" is in</p> <p>22 that sentence?</p> <p>23 MR. WARD: Same objection as to</p> <p>24 privilege.</p> <p>25 A Guidance.</p>

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1	C. Miolla	1	C. Miolla
2	Q So as you sit here today, you don't know	2	Q On January 6th at 7:14 p.m., you then
3	what kind of guidance you were seeking to get from	3	e-mailed Ms. McMahon and wrote, "Hi Aubry, I don't
4	Aubry; is that correct?	4	believe I've heard back from you, so just wanted to
5	MR. WARD: I'm going to object as to	5	check in again and see if you would be available for
6	form.	6	a call soon to discuss? Thank you."
7	A Can you ask your question again?	7	Did you send that e-mail?
8	MR. WOLNOWSKI: Could you please read it	8	A Yes.
9	back, Teri?	9	Q And in response, Ms. McMahon wrote, "Hey
10	(WHEREUPON, the previous question was	10	there, so sorry, I've been crazy busy with my sister
11	read by the court reporter.)	11	getting married. That sounds great. I can talk on
12	MR. WARD: Yes, objection as to form.	12	Friday at any point if you're available."
13	A Can you rephrase your question? I don't	13	She send you that e-mail?
14	understand it.	14	MR. WARD: Objection as to form.
15	Q So if I'm understanding this, Melanie	15	You may answer.
16	asked you to get guidance from Aubry; is that	16	Q Did she send you that e-mail, Ms. Miolla?
17	correct?	17	A I believe so, yes.
18	A No.	18	Q Do you have any reason to doubt that
19	Q So what did Melanie tell you to do?	19	Aubry McMahon sent you that e-mail which appears on
20	MR. WARD: And I'm going to repeat the	20	the bottom of the first page on January 6th, 2021 at
21	attorney/client privilege objection.	21	5:40 p.m.?
22	You may answer to the extent it doesn't	22	A No.
23	involve attorney/client information.	23	Q And in response, on January 7th of 2021
24	A I don't have any information that doesn't	24	at 8:54 a.m., you wrote, "No problem, Aubry. How
25	involve attorney/client privilege information.	25	about Friday at 1:00 p.m. EST? If that works for
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1	C. Miolla	1	C. Miolla
2	you, I will give you a call at that time. Thank you,	2	Q And when you made that phone call, please
3	Catherine."	3	tell me what, if anything, you can remember about
4	Did you send Aubry McMahon that e-mail?	4	that phone call.
5	A Yes.	5	A I think I just remember her not answering
6	Q On January 8th of 2021 at 10:59 a.m., did	6	the call.
7	you send Aubry McMahon an e-mail which read, "Hi	7	Q Ms. Miolla, at 2 o'clock, you sent an
8	Aubry, just wanted to check and make sure that	8	e-mail to Aubry McMahon which stated, "Aubry, since
9	1:00 p.m. EST works for me to give you a call today?	9	our communication on Tuesday, I've tried several
10	If I don't hear from you, I'll try calling at that	10	times to get in touch with you to discuss a
11	time. Thank you, Catherine."	11	discrepancy in your interview responses. Since I
12	Did you send that e-mail?	12	have not heard back from you to resolve the
13	A Yes.	13	discrepancy, I am rescinding the job offer that was
14	Q And in response, on Friday, January 8th,	14	extended to you on Monday, January 4th. I wish you
15	2021 at 9:01 a.m., Aubry McMahon wrote to you, "That	15	all the best in your future endeavors. Catherine."
16	sounds great, thanks so much."	16	Did you send that?
17	Is that correct?	17	A Yes.
18	A Yes.	18	Q Ms. Miolla, was it urgent that you speak
19	Q After this e-mail from Aubry to you on	19	with Aubry McMahon in light of her January 5th, 2021
20	January 8th, 2021 at 9:01 a.m., did the two of you	20	e-mail inquiring about potential time off which
21	connect via telephone at 1 o'clock p.m. EST that day?	21	appears at the bottom e-mail on page WV 82?
22	A No.	22	A Was it urgent?
23	Q Did you try to call Aubry McMahon at	23	Q Yes.
24	1 o'clock p.m. EST?	24	A I don't know.
25	A Yes.	25	Q Well, at any point in this e-mail chain,

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1	C. Miolla	1	C. Miolla
2	did you inform Ms. McMahon that it was urgent that	2	chain, is it fair to say that Aubry McMahon would
3	you and her speak on the telephone?	3	have no reason to believe that the two of you
4	A It doesn't appear that I wrote the word	4	speaking was urgent given what's written?
5	"urgent" in these e-mails.	5	MR. WARD: I object as to form and calls
6	Q Did you ever express a sense of urgency,	6	for speculation.
7	in your opinion?	7	You may answer.
8	MR. WARD: Objection as to form.	8	A I think it's clear that we -- I was
9	You may answer.	9	trying to reach her multiple times.
10	A I -- from these e-mails, it looks like I	10	Q But is it clear from these e-mails that
11	was trying to contact her fairly quickly.	11	it's urgent that you and her speak?
12	Q So is that a yes?	12	A I don't know.
13	A What was the original question?	13	Q Well, to be clear, wasn't the job in
14	MR. WOLNOWSKI: Could you read back the	14	question for which she had been offered employment
15	original question, Ms. Ratigan?	15	commencing February 1st, 2021; nearly a month in the
16	(WHEREUPON, the previous question was	16	future?
17	read by the court reporter.)	17	A Yes.
18	MR. WARD: Same objection.	18	Q And, in fact, didn't Ms. McMahon advise
19	A I don't know.	19	you that she was, in her words, "crazy busy" with her
20	Q Did you ever tell Ms. McMahon via any	20	sister getting married?
21	other form of communication other than e-mail that it	21	A That's written here, yes.
22	was urgent that you and her speak regarding her	22	Q So is it fair to say that Ms. McMahon
23	January 5th, 2021 e-mail to you?	23	notified you around this time that she was busy?
24	A No.	24	MR. WARD: Objection as to form.
25	Q In your opinion, as you read this e-mail	25	You may answer.
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1	C. Miolla	1	C. Miolla
2	A She indicates here that she's busy.	2	discrepancy may have been?
3	Q Did you understand that Ms. McMahon was	3	A I'm not sure.
4	busy upon reading these e-mails in or around	4	Q Was the discrepancy involving something
5	January 7th, 2021?	5	involving the standards of conduct?
6	A I understand that she said she was busy	6	A I believe so.
7	in her e-mail on the 6th.	7	Q In reviewing this January 5th e-mail from
8	Q Did you believe her?	8	Aubry McMahon to you, was the discrepancy -- does it
9	A I think so.	9	refresh your recollection as to whether the
10	Q Let me ask you a different question.	10	discrepancy was the fact that Aubry McMahon was
11	Did you have any reason to disbelieve	11	having a baby?
12	her?	12	A Can you ask that again?
13	A I don't think so.	13	Q Sure.
14	Q I'd like to direct your attention to the	14	In reviewing this e-mail, does it refresh
15	top e-mail on the first page of the document marked	15	your recollection that the discrepancy regarding the
16	WV 81.	16	standards of conduct was that Aubry McMahon was
17	What was the discrepancy you referenced	17	having a baby?
18	in that e-mail?	18	A No, I don't think so.
19	A I don't remember.	19	Q In reviewing this e-mail, does it refresh
20	Q Well, let's look at the first e-mail	20	your recollection as to whether or not the
21	then. It's on the bottom of the second page, the one	21	discrepancy at issue was her needing time off?
22	marked WV 82.	22	A No, I don't think so.
23	In reviewing this first e-mail which	23	Q In reviewing this e-mail from
24	Aubry McMahon sent to you on January 5th, 2021, does	24	January 5th, does it refresh your recollection as to
25	it refresh your recollection as to what that	25	the discrepancy as to the standards of conduct, her

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<p>1 C. Miolla Page 90</p> <p>2 disclosing that she was in a same-sex marriage?</p> <p>3 A I believe it was related to the standards</p> <p>4 of conduct, yes.</p> <p>5 Q When you say "it was related to the</p> <p>6 standards of conduct," do you mean her being in a</p> <p>7 same-sex marriage?</p> <p>8 A I mean the potential discrepancy.</p> <p>9 Q So is that a yes?</p> <p>10 A Can you ask your original question?</p> <p>11 Q Sure.</p> <p>12 In reviewing this e-mail, does it refresh</p> <p>13 your recollection as to whether the discrepancy with</p> <p>14 respect to standards of conduct related to</p> <p>15 Ms. McMahon disclosing that she was in a same-sex</p> <p>16 marriage?</p> <p>17 MR. WARD: Objection as to form.</p> <p>18 You may answer.</p> <p>19 A I don't think I fully understand the</p> <p>20 question.</p> <p>21 Q Okay. So you e-mailed Ms. McMahon about</p> <p>22 a discrepancy in her -- about a discrepancy that you</p> <p>23 wanted to discuss; correct?</p> <p>24 A Yes.</p> <p>25 Q And you previously testified that you</p>	<p>1 C. Miolla Page 91</p> <p>2 don't recall what that discrepancy was; is that</p> <p>3 accurate?</p> <p>4 A Yes.</p> <p>5 Q Now I'm asking you to review this e-mail</p> <p>6 and see if it refreshes your recollection. I've</p> <p>7 asked you a couple things about whether or not the</p> <p>8 discrepancy involved certain things that Ms. McMahon</p> <p>9 disclosed in this January 5 e-mail. That's not a</p> <p>10 question, but that's what I'm saying.</p> <p>11 Now I'm asking you, is that -- if</p> <p>12 reviewing this and in reviewing this, the fact that</p> <p>13 she disclosed being in a same-sex marriage, was that</p> <p>14 the discrepancy that needed to be discussed?</p> <p>15 MR. WARD: Same objection as before.</p> <p>16 You may answer.</p> <p>17 A I just remember receiving guidance about</p> <p>18 discussing if her answers to the standards of conduct</p> <p>19 were accurate.</p> <p>20 Q And if you can recall specifically, what</p> <p>21 questions needed to be discussed? If you'd like, you</p> <p>22 can look at the document if it's going to help you</p> <p>23 answer the question.</p> <p>24 A And which document are you referring to?</p> <p>25 Q It was the first document I showed you</p>
<p>1 C. Miolla Page 92</p> <p>2 marked Plaintiff's Exhibit 6.</p> <p>3 A And your question again?</p> <p>4 Q My question is, what was the discrepancy</p> <p>5 that needed to be addressed with Aubrey McMahon based</p> <p>6 upon your having reviewed this January 5th e-mail and</p> <p>7 allowing it to refresh your recollection?</p> <p>8 A I just remember that we were wanting to</p> <p>9 contact her to find out if she was indeed in</p> <p>10 alignment with our standards of conduct.</p> <p>11 Q And specifically what portion or portions</p> <p>12 of the standards of conduct were you seeking to</p> <p>13 clarify that she was in alignment?</p> <p>14 A I think primarily the line that reads any</p> <p>15 sexual conduct outside of a marriage; World Vision</p> <p>16 defines marriage as between a man and woman.</p> <p>17 Q And was that sought to be clarified</p> <p>18 because Ms. McMahon had disclosed she was in a</p> <p>19 same-sex marriage?</p> <p>20 MR. WARD: Objection as to form.</p> <p>21 You may answer.</p> <p>22 A I believe her e-mail was why we wanted to</p> <p>23 talk with her again about the standards of conduct.</p> <p>24 Q And what about that e-mail prompted you</p> <p>25 to want to have that conversation with her?</p>	<p>1 C. Miolla Page 93</p> <p>2 A Her question about the -- her having a</p> <p>3 wife and expecting their first baby, her question in</p> <p>4 that first -- second sentence.</p> <p>5 Q Now, in reviewing this e-mail dated</p> <p>6 January 5th, 2021, does it refresh your recollection</p> <p>7 as to whether one of the discrepancies that you</p> <p>8 wanted to discuss with her was the fact that she</p> <p>9 disclosed in this e-mail to you that she was gay?</p> <p>10 MR. WARD: Objection as to form.</p> <p>11 You may answer.</p> <p>12 A We wanted to discuss that portion of the</p> <p>13 standards of conduct again.</p> <p>14 Q As it relates to Aubrey McMahon</p> <p>15 potentially being gay?</p> <p>16 MR. WARD: Same objection as to form.</p> <p>17 A As it relates to her being able to comply</p> <p>18 with the standards of conduct.</p> <p>19 Q And is that with respect to her being</p> <p>20 gay?</p> <p>21 MR. WARD: Objection as to form.</p> <p>22 A We don't ask that question. We just ask</p> <p>23 the standards of conduct and ask if they can comply.</p> <p>24 Q Did the fact of Aubrey McMahon disclosing</p> <p>25 to you that she was gay have any impact on whether</p>

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<p>1 C. Miolla Page 94</p> <p>2 you wanted to discuss with her discrepancies -- or</p> <p>3 potential discrepancies in her responses during her</p> <p>4 phone screening?</p> <p>5 MR. WARD: Objection as to form.</p> <p>6 You may answer.</p> <p>7 A Well, at that point, I was following</p> <p>8 our -- guidance from my leadership and legal counsel.</p> <p>9 Q I'm not sure that answers the question.</p> <p>10 I think you -- you froze there for a moment.</p> <p>11 A Can you ask your question again?</p> <p>12 MR. WOLNOWSKI: Ms. Ratigan, could you</p> <p>13 please read my question back?</p> <p>14 (WHEREUPON, the previous question was</p> <p>15 read by the court reporter.)</p> <p>16 MR. WARD: Same objection.</p> <p>17 A At that point, I didn't feel like I was</p> <p>18 making that call. I was following guidance from my</p> <p>19 leadership and legal counsel.</p> <p>20 Q So the guidance that was expressed to</p> <p>21 you, right -- and I don't want to know about what was</p> <p>22 discussed with legal counsel, but from nonlegal</p> <p>23 counsel, the guidance that was expressed to you, what</p> <p>24 was discussed with you?</p> <p>25 MR. WARD: I'm going to object on the</p>	<p>1 C. Miolla Page 95</p> <p>2 grounds of privilege and on the grounds that</p> <p>3 legal counsel's guidance may be incorporated</p> <p>4 in other conversations.</p> <p>5 I'll instruct the witness not to answer</p> <p>6 as to any guidance that came from legal</p> <p>7 counsel directly or indirectly.</p> <p>8 A I believe all guidance involved legal</p> <p>9 counsel.</p> <p>10 Q Well, if you can, without telling me what</p> <p>11 was discussed, please tell me with whom you discussed</p> <p>12 it.</p> <p>13 MR. WARD: Objection as to form.</p> <p>14 You may answer.</p> <p>15 A Sorry, can you repeat your question? I</p> <p>16 think my Internet froze.</p> <p>17 Q Sure.</p> <p>18 MR. WOLNOWSKI: Ms. Ratigan, could you</p> <p>19 please read it back?</p> <p>20 (WHEREUPON, the previous question was</p> <p>21 read by the court reporter.)</p> <p>22 A So you'd like names?</p> <p>23 Q Yes, please.</p> <p>24 A I remember Melanie Freiberg, Steve</p> <p>25 McFarland, and I believe Jean Thompson.</p>
<p>1 C. Miolla Page 96</p> <p>2 Q And if you can tell me, who -- what role</p> <p>3 did Jean Thompson have in January of 2021, if you</p> <p>4 remember?</p> <p>5 A I don't know.</p> <p>6 Q Was he an attorney?</p> <p>7 A She's on our legal team.</p> <p>8 Q Okay.</p> <p>9 A Or maybe it was just Steve. I don't</p> <p>10 remember at that point.</p> <p>11 Q Ms. Miolla, to the extent you know, what</p> <p>12 was the reason or reasons why the job offer extended</p> <p>13 to Aubry McMahon was rescinded?</p> <p>14 A I believe it was because she wasn't in</p> <p>15 compliance with our standards of conduct.</p> <p>16 Q Was that the only reason?</p> <p>17 A That's my understanding.</p> <p>18 Q And if you could, please explain to me</p> <p>19 what portion of the standards of conduct she was not</p> <p>20 in compliance which formed the basis for the</p> <p>21 rescission.</p> <p>22 A I believe it was the line we've looked at</p> <p>23 previously, which is any sexual conduct outside of a</p> <p>24 marriage, with World Vision defines a marriage</p> <p>25 between a man and a woman.</p>	<p>1 C. Miolla Page 97</p> <p>2 Q And again, I don't want to know what</p> <p>3 legal counsel told you, but who communicated to you</p> <p>4 that this was the reason, as -- as you have described</p> <p>5 it?</p> <p>6 MR. WARD: I'm going to object as to</p> <p>7 privilege.</p> <p>8 But you can answer to the extent it</p> <p>9 doesn't involve privilege.</p> <p>10 A I don't remember who exactly from legal</p> <p>11 it was.</p> <p>12 Q Okay. But somebody in -- question</p> <p>13 withdrawn.</p> <p>14 And just to be clear, to your knowledge,</p> <p>15 the only reason that the offer of employment made to</p> <p>16 Aubry McMahon was rescinded was because it was</p> <p>17 concluded that she was not in compliance with World</p> <p>18 Vision's standards of conduct; is that correct?</p> <p>19 A I believe so, yes.</p> <p>20 Q From your knowledge, did it have anything</p> <p>21 to do with the expediency or lack thereof in</p> <p>22 communicating with you via e-mail on January --</p> <p>23 between January 5th and January 8th?</p> <p>24 MR. WARD: Objection as to form.</p> <p>25 You may answer.</p>

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1	C. Miolla	1	C. Miolla
2	A I don't believe so.	2	telephone call with Aubry McMahon; in other words,
3	Q What role, if any, did you personally	3	did you speak with Aubry McMahon on a telephone call
4	play in the final determination to rescind the job	4	after this?
5	offer made to Aubry McMahon?	5	A Yes.
6	A I wasn't personally involved in the	6	Q If you can, please tell me everything you
7	decision.	7	can remember about that telephone call.
8	Q To the extent you know, who made the	8	A I remember Melanie Freiberg and I both
9	final decision to rescind the job offer made to Aubry	9	being on call with Aubry, and Melanie doing most of
10	McMahon to work at World Vision Incorporated?	10	the talking. I -- I think I introduced Melanie, and
11	A I'm not sure who exactly from our HR,	11	then she and -- Melanie and Aubry talked from then
12	leadership, and legal team.	12	on.
13	Q Was it Melanie Freiberg?	13	Q Who initiated the call?
14	A I don't know.	14	A Can you define what you mean by
15	Q Was it Christine Talbot?	15	"initiated"?
16	A I don't know.	16	MR. WARD: I'm sorry, let me just flag.
17	Q Now, after you sent the e-mail to Aubry	17	The witness was breaking up on me. I
18	McMahon on January 8th, which appears at the top of	18	don't know if it was breaking up on everyone
19	page WV 81, did you have occasion to be on a	19	else.
20	telephone call with Aubry McMahon?	20	MR. WOLNOWSKI: Okay. So let's just
21	A Sorry, can you rephrase that?	21	start afresh here. I'll repeat the question.
22	Q Sure.	22	Q If you can remember, who initiated that
23	Now, after this e-mail that you sent to	23	call?
24	Aubry McMahon on January 8th of 2021, the one at the	24	A I was just asking if you could define
25	top of page WV 81, did you have occasion to be on a	25	what you meant by "initiate."
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1	C. Miolla	1	C. Miolla
2	Q Sure.	2	A About -- I just believe it was sometime
3	Let's start with the fact -- as to	3	that Friday afternoon after this e-mail.
4	whether or not it was a telephone call.	4	Q To the extent you know, who were all the
5	Was it a telephone call in which you,	5	participants on that call?
6	Ms. Freiberg, and Aubry participated, or was it --	6	A To the extent I know, it was myself,
7	A Yes.	7	Melanie, and Aubry.
8	Q -- something else, perhaps a video	8	Q How long did that telephone call last?
9	conference, a Zoom call, a Morse code communication?	9	A I think less than ten minutes.
10	MR. WARD: You forgot some before.	10	Q Would you say it was less than five
11	A It was a telephone call.	11	minutes?
12	Q Do you remember the person who -- well,	12	A I don't remember.
13	question withdrawn.	13	Q Would you say it was less than two
14	I'll ask, did you or Melanie call Aubry,	14	minutes?
15	or did Aubry call either one of you to initiate the	15	A I don't remember.
16	call?	16	Q Would you say it was more than one
17	A I believe after this e-mail, Aubry placed	17	minute?
18	a call to me that I missed, and then Melanie and I	18	A I think so.
19	called her back.	19	Q Okay. So is it fair to say that you
20	Q And when you and Melanie spoke with Aubry	20	think it was between one and ten minutes?
21	McMahon, was it just one telephone call or was it	21	A Yes.
22	multiple telephone calls?	22	Q If you can, please tell me everything
23	A I believe it was just one.	23	that you can remember that was said in that phone
24	Q Do you recall when that phone call was	24	call.
25	made, as in what time of day?	25	A I remember that I started the call and

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1	C. Miolla	1	C. Miolla
2	introduced Melanie, and then Melanie and Aubry talked	2	call.
3	from there.	3	Q Now that you've listened to it, do you
4	Q Okay. And please tell me everything that	4	recall the conversation which occurred on
5	was discussed between Melanie and Aubry, to the	5	January 8th, 2021 in which you were a participant
6	extent you remember.	6	with Ms. McMahon and Ms. Freiberg?
7	A I don't remember the extent of their	7	A I recall that happened, yes.
8	conversation.	8	Q In light of having listened to this, does
9	Q Ms. Miolla, I'd like to share with you	9	it refresh your recollection about the -- anything
10	what has been marked as Plaintiff's Exhibit 10. It	10	that was said during that telephone call?
11	is an audio file. It is in MP3 format. It is an	11	A I remember that section being part of the
12	item which was exchanged during the discovery phase	12	phone call, but I don't remember specifics around
13	of litigation in this case.	13	what else was said.
14	If you could, please listen to it on your	14	Q After having listen to that audio
15	own and let me know once you've completed doing so.	15	recording, to your knowledge, is that Aubry McMahon
16	It's approximately 35 seconds long.	16	and Melanie Freiberg as the two people speaking on
17	MR. WOLNOWSKI: Going off the record.	17	the audio?
18	(Discussion held off the record)	18	A To my knowledge, yes.
19	A I've listened to the recording.	19	Q Would you agree that Melanie Freiberg
20	Q One moment.	20	states in this audio recording, "Well, it's because,
21	Ms. Miolla, do you recognize this audio	21	um, the standards of conduct, yeah, are to, um, not
22	file?	22	have any sexual conduct outside of marriage, and
23	A Sort of.	23	marriage is defined as being between a man and a
24	Q Have you ever listened to it before?	24	woman, so that's the behavior that all employees have
25	A Not the audio file. I was on the phone	25	to comply with"?
Page 104		Page 105	
1	C. Miolla	1	C. Miolla
2	A I believe so, yes.	2	MR. WARD: Objection --
3	Q Do you know what standard of conduct	3	Q -- in order to continue their employment
4	Melanie Freiberg was referring to in this audio?	4	with World Vision?
5	A I believe it was the one she read after	5	MR. WARD: Objection as to form.
6	that.	6	You may answer.
7	Q Ms. Miolla, based upon your listening to	7	A Well, my part of the role is to read the
8	this audio, was the reason the offer of employment	8	standards of conduct and ask whether or not they
9	made by World Vision to Aubry McMahon rescinded	9	agree with it. So beyond that, it's up to the
10	because she was in a same-sex marriage?	10	candidate.
11	MR. WARD: Objection as to form.	11	Q I don't think that answers my question.
12	You may answer.	12	I -- I'm not asking what your role was. I'm asking
13	A I believe it was, as Melanie said, that	13	if you know something.
14	she wasn't in alignment with the standards of	14	MR. WOLNOWSKI: Ms. Ratigan, could you
15	conduct.	15	please read the question back?
16	Q And to your knowledge, was this standard	16	(WHEREUPON, the previous question was
17	of conduct she was referencing one that prohibited	17	read by the court reporter.)
18	World Vision Incorporated employees from being in a	18	A We ask employees to comply with what's
19	same-sex marriage?	19	written in the standards of conduct.
20	MR. WARD: Objection as to form.	20	Q I'm not sure that answers the question.
21	You may answer.	21	I'm not asking a question about what you ask
22	A I'm not sure.	22	potential employees or employees to do.
23	Q So as you sit here today, you don't know	23	MR. WOLNOWSKI: Ms. Ratigan, could you
24	whether or not World Vision Incorporated prohibits	24	please read back the question?
25	employees from being in same-sex marriages --	25	(WHEREUPON, the previous question was

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1	C. Miolla	1	C. Miolla
2	read by the court reporter.)	2	violation of World Vision Incorporated's standards
3	MR. WARD: So I'm going to object as to	3	of -- standards of conduct for employees?
4	form and object as asked and answered.	4	MR. WARD: Objection as to form, it calls
5	THE WITNESS: So I answer?	5	for speculation.
6	MR. WARD: To the extent you can.	6	A I don't know.
7	A I don't know.	7	Q So you don't know whether or not a man
8	Q Okay. In light of listening to this	8	who's married to a woman would violate the standards
9	audio recording, was the employment offer made to	9	of conduct for World Vision?
10	Aubry McMahon by World Vision rescinded because she	10	A Well, I would read the standards of
11	was gay?	11	conduct and ask them if they could comply.
12	MR. WARD: Objection as to form.	12	Q I'm not sure that answers the question
13	You may answer.	13	about what -- I'm not asking what you would ask an
14	A No.	14	employee.
15	Q So was it because Aubry McMahon was in	15	MR. WOLNOWSKI: Ms. Ratigan, could you
16	violation of World Vision Incorporated's standards of	16	read back the question?
17	conduct for employees as they related to her being in	17	(WHEREUPON, the previous question was
18	a same-sex marriage that this disqualifies her from	18	read by the court reporter.)
19	working for World Vision Incorporated?	19	A I don't know whether or not someone can
20	MR. WARD: Objection as to form.	20	comply with the standards of conduct. I ask them
21	A I believe she -- her offer was rescinded	21	that.
22	because our leadership team and legal determined she	22	Q Again, I'm not sure that answers the
23	was not in compliance with the standards of conduct.	23	question.
24	Q To your knowledge, if Aubry McMahon had	24	MR. WOLNOWSKI: If you could, please read
25	been a man married to a woman, would she have been in	25	the question back, Ms. Ratigan.
	Page 108		Page 109
1	C. Miolla	1	C. Miolla
2	It's actually a very straightforward	2	back, Ms. Ratigan?
3	question.	3	(WHEREUPON, the previous question was
4	A I don't think I'm understanding the	4	read by the court reporter.)
5	question.	5	A I don't believe the offer would have been
6	Q If a man discloses that he's married to a	6	rescinded if she confirmed that she could comply with
7	woman and is seeking employment with World Vision,	7	the standards of conduct.
8	would that disqualify him for employment with World	8	Q Ms. Miolla, I'd like to show you what
9	Vision?	9	will be marked Plaintiff's Exhibit 13.
10	MR. WARD: Then I'll repeat the same two	10	MR. WOLNOWSKI: Let's go off the record
11	objections.	11	for a moment.
12	A I don't believe someone sharing just that	12	(Discussion held off the record)
13	fact would disqualify them unless they said they	13	Q Ms. Miolla, I'd like to show you what
14	didn't comply with the standards of conduct.	14	will be marked Plaintiff's Exhibit 13. It's a
15	Q To your knowledge, if Aubry McMahon had	15	document bearing Bates-stamped Number WV 65 as a
16	been a man and married to a woman and stated that she	16	document which was exchanged during the discovery
17	complied with World Vision's standards of conduct,	17	phase of litigation.
18	would the offer of employment extended to her on	18	(WHEREUPON, the above-referred-to
19	January 5th been rescinded by World Vision?	19	document, Bates-stamped WV-000065, was marked
20	MR. WARD: Objection as to form and	20	as Plaintiff's Exhibit 13, for identification,
21	calling for speculation.	21	as of this date.)
22	You may answer.	22	Q Please review this document and let me
23	A Sorry, I think you cut out.	23	know once you've completed doing so.
24	Can you ask that again?	24	A (Perusing a document)
25	MR. WOLNOWSKI: Can you please read that	25	I've reviewed the document.

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1	C. Miolla	1	C. Miolla
2	MR. WOLNOWSKI: I would just like to mark	2	I think any time anything would -- any
3	for the record that I am continuing with the	3	step happens with a candidate in the system, the
4	numbering of the deposition exhibits from	4	system automatically records it as a line item.
5	where I left off with the previous deposition	5	Q Now, Ms. Miolla, from your
6	of Ms. Freiberg for the sake of clarity.	6	recollection -- question withdrawn.
7	Q Ms. Miolla, do you recognize this	7	Ms. Miolla, it appears as though you
8	document?	8	created practically all of these fields; is that
9	A Yes.	9	correct?
10	Q Have you ever seen it before?	10	A They're created automatically. So
11	A Not as a document.	11	because I was assigned to this requisition, it has my
12	Q Can you please tell me what this document	12	name by all of them.
13	shows?	13	Q Is there any fields, from your
14	A It shows the steps that have happened	14	recollection, or any actions which are missing as
15	within the applicant tracking system.	15	they relate to Aubry McMahon?
16	Q Near the top of this document, it reads,	16	A I don't think so.
17	"History of Events and Comments"; do you see that?	17	Q Ms. Miolla, I'd like to focus on
18	A Yes.	18	numbers 2 and 1, with the question as to number 2
19	Q These fields seem to be in ascending	19	first.
20	order from a number 13 entry which was made on	20	Do you see field number 2? It appears
21	November 25th, 2020 to the number 1 entry which was	21	about a quarter of the way down.
22	made on January 8th, 2021; would you agree?	22	A Yes.
23	A Yes.	23	Q It reads, "Profile moved from
24	Q Can you please explain to me what this	24	background-reference check to offer extended."
25	is?	25	Do you see that?
Page 112		Page 113	
1	C. Miolla	1	C. Miolla
2	A Yes.	2	made to Aubry McMahon was definitively rescinded on
3	Q And states that the creator was Catherine	3	January 8th, 2021?
4	Miolla; do you see that?	4	A Yes, I believe so.
5	A Yes.	5	MR. WOLNOWSKI: Okay. Let's take a
6	Q Did you input that field, or was it	6	ten-minute break and then return around --
7	created in a different way?	7	we'll let's call it an eight -- we're off the
8	A It's created automatically when I move	8	record, Teri.
9	her profile to a certain step.	9	(Discussion held off the record)
10	Q Based upon your review of this document,	10	(WHEREUPON, a brief recess was taken,
11	is it correct to conclude that an offer of employment	11	after which the following transpired:)
12	was definitively made to Aubry McMahon on	12	(Time noted: 4:07 p.m.)
13	January 4th, 2021?	13	CONTINUED EXAMINATION BY MR. WOLNOWSKI:
14	A I believe so.	14	Q Ms. Miolla, I'd like to show you what has
15	Q And now turning to number 1, which is	15	been marked as Plaintiff's Exhibit Number 1. I can
16	right above number 2, it reads, "Profile moved from	16	represent it's a document which bears Date-stamped
17	offer extended to archive, do not consider."	17	Numbers WV 48 through 50. It is a document which has
18	Do you see that?	18	been exchanged during the discovery phase of
19	A Yes.	19	litigation in this case.
20	Q Did you input that field on January 8th,	20	If you could, please review it and let me
21	2021, or was it created in a different way?	21	know once you've concluded reviewing it.
22	A It's created automatically when I -- when	22	A (Perusing a document)
23	a candidate's moved to a certain phase.	23	I'm finished reviewing.
24	Q Based on your review of this document, is	24	Q Ms. Miolla, do you recognize this
25	it correct to conclude that the offer of employment	25	document?

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1		C. Miolla	C. Miolla
2	A	Yes.	advisory, something else?
3	Q	Can you tell me what it is?	MR. WARD: I'll object as to form.
4	A	It's a job posting for the donor/customer	But you may answer.
5		service representative trainee position.	
6	Q	To your knowledge, was this the	A I think those are examples of the common
7		particular job for which Aubry McMahon had applied	tasks that someone in this role could expect to be
8		with World Vision?	doing.
9	A	I believe so, yes.	Q Are all of them obligatory; as in other
10	Q	How familiar are -- are you with the	words, are they all things that a person in this role
11		responsibilities and requirements of an individual in	would be required to do?
12		the position of customer service representative with	A Yes, I believe so.
13		World Vision as it existed in January of 2021?	Q I'd like to direct your attention to
14	A	I have never personally done the job, but	number 1. It appears at the top of page 49.
15		at that time, I had been recruiting for it for a bit	The second sentence states, "Attend and
16		of time, so I'd say somewhat familiar.	participate in a leadership of devotions, weekly
17	Q	Okay. I'd like to direct your attention	chapel services, regular prayer."
18		to Section 1 -- excuse me, I'd like to direct your	Do you see that?
19		attention to the section which states, "The Job." It	A Yes.
20		appears there are two Section 1s, but in any case --	Q To your knowledge, does that require
21		and it lists a number of things which appear to be	customer service representatives to lead prayer?
22		job requirements; do you see that?	A Yes, I believe so.
23	A	Yes.	Q And was there any training incorporated
24	Q	If you could, how would you describe	with -- with customer service representatives leading
25		numbers 1 through 13; are they obligatory, are they	prayer?
			A I'm not sure.
		Page 116	Page 117
1		C. Miolla	C. Miolla
2	Q	And with respect to leading prayer, to	A What do you mean?
3		whom would they be leading prayer for?	Q Well, you said that there are regular
4	A	I believe in this role, they could be	parts of the job that would require one to lead
5		leading prayer with their coworkers or -- and/or the	prayer.
6		donors that they're talking to.	I said, like what?
7	Q	And if you can, please explain to me the	A Oh, like the previous activities I have
8		requirements for leading prayer; was it during	mentioned, like the team devotions and the phone
9		meetings, during phone calls, and under what	calls with donors.
10		circumstances were they required to lead prayer?	Q Was it on every phone call that a
11	A	I don't know the specifics, but I think	customer service representative was required to lead
12		in this role they could be leading prayers during the	prayer with donors?
13		activities mentioned in number 1, like devotions with	A I don't think it's necessarily every
14		the team or phone calls with their donors, as	phone call.
15		mentioned in number 11.	Q Well, how frequently then was it
16	Q	Okay. Was it required that customer	required?
17		service representatives lead prayer with either	A I'm not sure.
18		donors or fellow employees?	Q Well, was it required one out of every
19	A	I'm not sure.	five phone calls?
20	Q	Was it something that was just suggested,	A I'm not sure.
21		rather than an actual requirement of the job?	Q And which prayers were donors required --
22	A	I believe that they -- the -- for this	excuse me, which prayers were customer service
23		role, they were -- are regular parts of the job that	representative required to utilized?
24		would be required.	MR. WARD: I'm going to object as to
25	Q	Like what?	form.

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1	C. Miolla	1	C. Miolla
2	A What do you mean by "which prayers were	2	Q Was it required that customer service
3	they required to utilize"?	3	representatives initiate prayer with the donors
4	Q Would you agree there's different prayers	4	without being asked by the donors?
5	in the Christian faith; correct?	5	MR. WARD: Objection as to form.
6	A I suppose so, yes.	6	You may answer.
7	Q Okay. Which of those prayers were	7	A I'm not sure if it's required or not. I
8	required of use -- of use by customer service	8	think it's a big part of the role.
9	representatives, if any?	9	Q Is it a big part of the role because it's
10	MR. WARD: I'm going to object as to	10	encouraged or because it's mandatory?
11	form.	11	MR. WARD: Objection as to form.
12	A I'm not sure of anything specific	12	You may answer.
13	required other than that they -- the agents would	13	A To the best of my knowledge, I would say
14	often ask donors if they had prayer requests and then	14	that it's required, and therefore, that's why it's
15	pray with them.	15	explicitly stated on this list.
16	Q Okay. So if I'm understanding this, it	16	Q And if you could point out to me where it
17	was required that if a donor asks to pray, that the	17	states that it's required to lead prayer. If you
18	customer service representative was obliged to do so;	18	could tell me the page number and -- and kind of
19	is that accurate?	19	explain to me where on that page it states that it's
20	A I think it would be -- if the donor asked	20	required that a customer service representative lead
21	for prayer, I think it would at least be strongly	21	prayers.
22	encouraged the agent pray with them.	22	MR. WARD: Objection as to form.
23	Q But it isn't required; correct?	23	You may answer.
24	A I -- I'm -- that's outside of my	24	A Well, I shared earlier that I feel like
25	knowledge.	25	all of these numbers are requirements of the role,
Page 120		Page 121	
1	C. Miolla	1	C. Miolla
2	and the requirements listed that speak to prayer are	2	Q And how frequently, when you say
3	number 1 and number 11.	3	"oftentimes," is --
4	Q So is your testimony that number 1 states	4	A I'm not sure --
5	that there's a requirement that a customer service	5	Q -- it a requirement, that is?
6	representative lead prayer?	6	A I'm not sure exactly how often for this
7	A Well, the word "required" isn't listed in	7	particular role.
8	the statement, but I believe that all of these are	8	Q Is there any kind of training when it
9	things that are required in the role.	9	comes to leading prayer as it relates --
10	Q All right. But I'm specifically talking	10	A I don't know.
11	about prayer.	11	Q -- to the customer service
12	So is it your testimony here today that	12	representative?
13	so much of Section 1, which states, "Attend and	13	A I'm not sure.
14	participate in the leadership of devotions, weekly	14	Q It states in Section 11, "Be sensitive to
15	chapel services, and regular prayer," that the word	15	donor's needs and pray with them when appropriate."
16	"participant" is understood, at least insofar as your	16	Do you see that?
17	understanding of the job description, to mean that a	17	A Yes.
18	customer service representative leads prayer?	18	Q Can you explain to me what it means when
19	MR. WARD: I'm going to object as to	19	it says "when appropriate"?
20	form; mischaracterizing prior testimony.	20	A I think that could be a variety of
21	You may answer.	21	things; if the donor asks for prayer, if you're
22	A I think number 1 is stating that they	22	having a conversation and you ask the donor if they
23	would be included in leadership of devotion and	23	want prayer.
24	regular prayer. And oftentimes, in leadership of our	24	Q Is this just your opinion or is this the
25	devotionals together, that includes leading prayer.	25	required duties and responsibilities of World Vision,

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Page 122		Page 123	
1	C. Miolla	1	C. Miolla
2	to your knowledge?	2	Q Is somebody in the position of customer
3	MR. WARD: I'm going to object as to	3	service representative, insofar as the job existed in
4	form.	4	January of 2021, required to teach the religion to
5	A This list is the requirements. What I	5	anybody; whether it be donors, fellow employees, or
6	just --	6	anybody else?
7	Q Right.	7	MR. WARD: Objection as to form.
8	A -- tried to explain is my opinion of how	8	A I don't believe they are required to
9	to explain it.	9	teach religion in this role.
10	Q So what is World Vision's position,	10	Q With respect to attending weekly chapel
11	insofar as you know, as what is an appropriate time	11	services, did you attend weekly chapel services in
12	and not an appropriate time to pray with donors?	12	January of 2021?
13	MR. WARD: Objection as to form.	13	A Did I personally?
14	A I don't think I have any additional	14	Q Yes.
15	knowledge in -- other than what I already shared	15	A Yes.
16	about when would be an appropriate or non-appropriate	16	Q Can you explain to me what that entailed?
17	time.	17	I understand that January of 2021 was still in many
18	Q Well, I'm not asking about your opinion.	18	ways, you know, during COVID, so if you could, please
19	I'm asking if you know what World Vision's official	19	explain to me what that entailed for you.
20	policy is insofar as how it relates to the mandatory	20	A Well, it would vary week to week, but
21	job responsibilities and requirements of somebody in	21	since COVID, we would join chapel virtually and
22	the position of customer service representative.	22	listen and sometimes interact via the chat to the
23	MR. WARD: Objection as to form.	23	worship or the -- and/or the speaker that was at that
24	A I don't know the initial policy related	24	chapel.
25	to this.	25	Q Were customer service representatives,
Page 124		Page 125	
1	C. Miolla	1	C. Miolla
2	people employed in that position, attendees at these	2	A I've been required to lead devotions on
3	weekly chapel services that you attended?	3	my team.
4	A I believe so.	4	Q And who's directed you to do that?
5	Q Were there different weekly chapel	5	A I don't remember being specifically told
6	services that were -- were attended by other people,	6	by one person, but that's kind of the understanding
7	or was it just one weekly chapel service that anybody	7	from leadership.
8	who worked for World Vision could attend?	8	Q In January of 2021, who was in charge --
9	A Just one chapel service for all of World	9	excuse me, who was the supervisor or boss for the
10	Vision U.S.	10	customer service representatives employed by World
11	Q Did you ever lead prayer during those	11	Vision?
12	weekly chapel services?	12	A I don't remember.
13	A Did I personally?	13	Q Do you remember if he or she required
14	Q Yes.	14	customer service representatives to lead prayer
15	A No, I don't believe so.	15	amongst employees?
16	Q Was that, to your knowledge, a	16	A I believe they would have.
17	requirement of your job with World Vision, was to	17	(Continued on page 126 so that the
18	lead daily chapel services?	18	conclusion of the testimony may be accompanied
19	A Not chapel --	19	by the jurat.)
20	MR. WARD: Objection as to form.	20	
21	You may answer.	21	
22	A Not -- I wasn't required to lead within	22	
23	chapel.	23	
24	Q Were you required to lead prayer not	24	
25	within chapel?	25	

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1	C. Miolla	Page 126	1	C. Miolla	Page 127
2			2		
3	Q Well, I'm not asking whether they would		3	I N D E X	
4	have done something. I'm asking whether or not you		4		
5	know if they actually did.		5	WITNESS	EXAMINATION BY
6	A Oh, well, I'm not sure. I'm not in their		6	Catherine Miolla	Casey Wolnowski
7	daily meetings.		7		5
8	MR. WARD: Okay. I have no further		8		
9	questions.		9	EXHIBITS	
10	MR. WARD: Very good.		10		
11	(WHEREUPON, the examination of this		11	PLAINTIFF'S	
12	witness was concluded at 4:24 p.m.)		12	EXHIBITS	DESCRIPTION
13			13	Bates-stamped WV-000064	109
14	CATHERINE MIOLLA		14		
15			15	(WHEREUPON, original exhibits marked	
16			16	during today's deposition were retained by	
17	Subscribed and sworn to before me		17	U.S. Legal Support.)	
18	this ____ day of _____ 2023.		18		
19			19		
20	NOTARY PUBLIC		20		
21			21		
22			22		
23			23		
24			24		
25			25		
1	C. Miolla	Page 128	1	C. Miolla	Page 129
2	ERRATA SHEET FOR THE TRANSCRIPT OF:		2		
3	Case Name: AUBRY MCMAHON v WORLD VISION, INC.		3	C E R T I F I C A T E	
4	Proceeding Date: March 2, 2023		4		
5	Deponent: CATHERINE MIOLLA		5	I, THERESA RATIGAN, a Shorthand Reporter and	
6	Place: Remote Video Conference		6	Notary Public of the State of New York, do hereby	
7	* PLEASE MAKE ANY CORRECTIONS/CHANGES BELOW AND		7	certify:	
8	NOTE THE REASON FOR SAME *		8	That the witness whose examination is	
9	PG / LN / NOW READS / SHOULD READ / REASON		9	hereinbefore set forth, was duly sworn, and that such	
10	____ / ____ / ____ / ____ / ____ /		10	examination is a true record of the testimony given	
11	____ / ____ / ____ / ____ / ____ /		11	by such witness.	
12	____ / ____ / ____ / ____ / ____ /		12	I further certify that I am not related to any	
13	____ / ____ / ____ / ____ / ____ /		13	of the parties to this action by blood or marriage;	
14	____ / ____ / ____ / ____ / ____ /		14	and that I am in no way interested in the outcome of	
15	____ / ____ / ____ / ____ / ____ /		15	this matter.	
16	____ / ____ / ____ / ____ / ____ /		16	IN WITNESS WHEREOF, I have hereunto set my	
17	____ / ____ / ____ / ____ / ____ /		17	hand this 10th day of March 2023.	
18	____ / ____ / ____ / ____ / ____ /		18		
19	Under penalties of perjury, I declare that I have		19		
20	read the foregoing transcript and that the facts		20		
21	stated in it are true.		21		
22	CATHERINE MIOLLA	DATE	22		
23	Subscribed and sworn to before me		23		
24	this ____ day of _____ 2023.		24		
25	NOTARY PUBLIC		25		

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